# HEALTH-BASED MAXIMUM CONTAMINANT LEVEL SUPPORT DOCUMENT: PERFLUORONONANOIC ACID (PFNA)

New Jersey Drinking Water Quality Institute Health Effects Subcommittee March 31, 2015

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## Acronyms

BMD — Benchmark Dose Modeling

BMDL — Lower 95% Confidence Limit

CAR — Constitutive androstane receptor

DWQI — Drinking Water Quality Institute

ECHA — European Chemical Agency Risk Assessment Committee

FTOH - Fluorotelomer alcohol

GD — Gestational Day

GM — Geometric mean

IRIS — Integrated Risk Information System

KO — Knockout (PPAR-alpha null)

LD<sub>50</sub> — Lethal Dose

LOAEL — Lowest Observed Adverse Effect Level

MCL — Maximum Contaminant Level

NHANES — National Health and Nutrition Examination Survey

NJDEP — New Jersey Department of Environmental Protection

NJDOH — New Jersey Department of Health

NOAEL — No Observed Adverse Effect Level

PFC — Perfluorinated Chemical

PFHxS — Perfluorohexane sulfonate

PFOA — Perfluorooctanoic acid

PFOS — Perfluorooctane sulfonate

PFNA — Perfluorononanoic acid

PFUnDA — Perfluoroundecanoic acid

PND — Postnatal Day

POD — Point of Departure

PPAR --- Peroxisome proliferator activated receptor

PVDF — Polyvinylidene fluoride

PXR — Pregnane X receptor

RfD — Reference Dose

RSC — Relative Sources Contribution

SDWA — Safe Drinking Water Act

UCMR3 — Unregulated Contaminant Monitoring Rule 3

UFs — Uncertainty factors

USEPA —United States Environmental Protection Agency

WT — Wild Type

## **ABSTRACT**

A Health-based Maximum Contaminant Level (Health-based MCL) for perfluorononanoic acid (PFNA, C9) was developed to protect for chronic (lifetime) drinking water exposure. The Health-Based MCL is based on a study of developmental effects in which pregnant mice were exposed to PFNA for 16 days. The Health-based MCL is further supported by data on effects in the offspring in the same study, and on increased liver weight and other effects in additional rodent studies from the same and other laboratories. Benchmark dose modeling was performed on PFNA levels in blood serum that caused increased maternal liver weight in the pregnant mice. Appropriate uncertainty factors were applied to protect sensitive human subpopulations, account for differences between human and experimental animals, protect for chronic exposure, and account for the incomplete toxicology database for PFNA. Based on available toxicokinetic data from animal and humans, a ratio of 200:1 was used to estimate the increase in PFNA in human blood serum from ongoing exposure to a given concentration of PFNA in drinking water. A chemical specific Relative Source Contribution factor of 50% was developed based on the most recent NHANES data for the 95<sup>th</sup> percentile PFNA serum levels in the U.S. general population. Using this information, a Health-based MCL protective for chronic drinking water exposure of 13 ng/L (0.013 μg/L) was derived.

## INTRODUCTION

Development of Health-based MCLs by New Jersey Drinking Water Quality Institute

The New Jersey Drinking Water Quality Institute (DWQI), established by the 1984 amendments to the New Jersey Safe Drinking Water Act (SDWA) at N.J.S.A. 58:12A-20, is charged with developing standards (Maximum Contaminant Levels; MCLs) for hazardous contaminants in drinking water and for recommending those standards to the New Jersey Department of Environmental Protection (NJDEP). The Health Effects Subcommittee (formerly "Lists and Levels Subcommittee") of the DWQI is responsible for recommending health-based drinking water levels (Health-based MCLs) as part of the development of MCLs (NJDWQI, 1987; 1994; 2009).

Health-based MCLs are based on the goals specified in the 1984 Amendments to the NJ SDWA. For carcinogens, it is generally assumed that any level of exposure results in some level of cancer risk, and a one in one million (10<sup>-6</sup>) risk level from lifetime exposure is specified in the statute. Health-based MCLs for carcinogens are thus set at levels that are not expected to result in cancer in more than one in one million persons ingesting the contaminant for a lifetime. For non-carcinogenic effects, it is generally assumed that exposure below a threshold level will not result in adverse effects. As specified in the statue, Health-based MCLs are set at levels which are not expected to result in in "any adverse physiological effects from ingestion" for a lifetime.

Other factors such as analytical quantitation limits and availability of treatment removal technology are also considered in the final MCL recommendation. For carcinogens, the 1984 Amendments to the NJ SDWA require that MCLs are set as close to the one in one million lifetime risk goal as possible "within the limits of medical, scientific and technological feasibility." For non-carcinogens, MCLs are set as close to the goal of no adverse effects as possible "within the limits of practicability and feasibility."

On March 21, 2014, the Commissioner Bob Martin of the NJDEP requested that DWQI

recommend an MCL for perfluorononanoic acid (PFNA, C9).

To support the development on an MCL recommendation by the DWQI, the Health Effects Subcommittee has developed a Health-based Maximum Contaminant Level for PFNA. As specified in the Amendments to the NJ SDWA, this Health-based MCL is intended to be protective for chronic (lifetime) drinking water exposure.

## Document development process

The Subcommittee conducted a literature search of the PubMed and Toxline databases for potentially relevant information. Additional references were identified through backward searching. In total, approximately 455 references were identified (Appendix 1). All of these references were screened by title, abstract and/or full text. Based on this screening, 169 references relevant to human health effects, human biomonitoring, animal toxicology, pharmacokinetics, and *in vitro* studies were designated for "further consideration" while 292 other references not relevant to these areas were excluded. Some references that were excluded as irrelevant to these topics were used to inform supporting sections of this assessment, such as the "Background Information" and "Environmental Sources, Fate, and Occurrence" sections.

In May 2014, the DWQI posted a request for public input regarding data or technical information about the toxicology, epidemiology, toxicokinetics, or other health effects topics related to PFNA that should be considered in developing an MCL. The Health Effects Subcommittee received and considered comments relevant to these topics that were submitted by the public.

NJDEP has recently developed a draft Interim Specific Ground Water criterion for PFNA. Like Health-based MCLs, NJ Interim Specific Ground Water Criteria are intended to be protective for chronic (lifetime) drinking water exposure. The Health Effects Subcommittee reviewed the Draft Technical Support Document for the Interim Specific Ground Water Criterion for PFNA (NJDEP, 2014). Some sections of the Health-based MCL Support Document were developed *de novo* by the Health Effects Subcommittee, while other sections are based on updates of relevant information from the Draft Technical Support Document.

### BACKGROUND INFORMATION

Perfluorinated chemicals (PFCs) are a class of anthropogenic chemicals with structures consisting of a totally fluorinated carbon chain of varying length and a charged functional group, such as carboxylic or sulfonic acid (Lindstrom et al., 2011). The eight carbon compounds, perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) have been the most intensively studied PFCs in the past. Recent research has focused on a wider range of PFCs including PFNA, the nine carbon perfluorinated carboxylic acid, which is the subject of this document. Because PFOA and PFNA are closely related and share similar properties, some of the discussions to follow include comparisons with information on PFOA as a part of the basis for evaluation of PFNA.

Physical and Chemical Properties (ATSDR, 2009; ALS Environmental, 2014)

Chemical Name: Perfluorononanoic acid

Synonyms: PFNA, C9 CAS Number: 375-95-1Chemical Formula:  $C_9HF_{17}O_2$  Chemical Structure:  $CF_3(CF_2)_7COOH$ 

Molecular Weight: 464.08

Physical State: white crystalline powder

Melting Point: 65-68 °C

Boiling Point: 218 °C at 740 mm Hg

Vapor Pressure: No data

Water Solubility 9.5 g/L at 25 °C

Log octanol/water

partition coefficient: Not applicable

Taste Threshold (water): No data
Odor Threshold (water): No data
Odor Threshold (air): No data

PFNA is a fully fluorinated carboxylic acid. Because carbon-fluorine bonds are among the strongest found in organic chemistry, PFNA and other PFCs are extremely stable and resistant to chemical reactions (Post et al., 2013).

PFNA and other PFCs contain a long perfluorocarbon tail that is both hydrophobic and oleophobic (repels both water and oil) and a charged functional group that is hydrophilic. Because they form a separate layer when mixed with hydrocarbons and water, measurement of the octanol:water partition coefficient is not practical (Prevedouros et al., 2006).

PFNA is manufactured as its ammonium salt, ammonium perfluorononanoate (APFN), which dissociates in water. At the pH range found in drinking water (6.5-8.5), PFNA is present almost totally in the non-volatile anionic form, the perfluorononanoate anion (Goss, 2008; Rayne and Forest, 2010).

#### Production and Use

The production, industrial uses, and environmental fate of PFNA were reviewed by Prevedouros et al. (2006). Production of PFNA began in 1975; it was made primarily in Japan. It is produced as the linear isomer of its ammonium salt (ammonium perfluorononanoate, APFN). It was estimated that 10% of the APFN that was produced was released to air and water at the production facility, resulting in global emissions of 70,000 to 200,000 kg PFNA between 1975 and 2004.

PFNA is the primary component of Surflon S-111 (CAS # 72968-3-88), a commercial mixture of linear perfluorinated carboxylic acids. Prevedouros et al. (2006) report the composition of Surflon S-111 by weight as PFNA, 74%; perfluoroundecanoic acid (PFUnDA, C11), 20%; perfluorotridecanoic acid (C13), 5%; PFOA (C8), 0.78%; perfluorodecanoic acid (C10), 0.37%; and perfluorododecanoic acid (C12), 0.1%.

The primary historic use of PFNA was as a processing aid in the emulsion process used to make fluoropolymers, mainly polyvinylidene fluoride (PVDF), similar to the use of PFOA as a processing aid in the production of polytetrafluoroethylene (PTFE). PFNA is used to solubilize the monomer, vinylidene fluoride, used to make PVDF (Prevedouros et al., 2006). Prevedouros et al. (2006) lists the 2002 production capacities of major producers of PVDF by the emulsion process which uses PFNA/Surflon S-111. The two highest capacity facilities using the emulsion process in 2002 were located in Calvert City, KY (8.4 x 10<sup>6</sup> kg/yr) and Thorofare (West

Deptford), NJ (7.7 x 10<sup>6</sup> kg/yr), with lower capacity sites in France and Japan. PVDF is resistant to high temperatures and is chemically non-reactive. Uses of PVDF include: in tanks, valves, pipes, and other components which come into contact with reactive chemicals; as insulation for wire and printed circuit boards; as a coating in pressure and thermal optic sensors; as a binder for electrodes on lithium ion batteries; in artificial membranes used for biomedical applications, for monofilament fishing lines; and in architectural coatings (TOEFCO, 2014). PFNA is not an intended component of PVDF and is present only at trace levels (100-200 ppm) in the PVDF fluoropolymer used in commercial and industrial products that is produced with PFNA (Prevedouros et al., 2006).

It is estimated that 60% of the PFNA used in PVDF manufacturing worldwide was released to the environment, resulting in global emissions of 400,000 to 1,400,000 kg from 1975-2004 (Prevedouros et al., 2006). Data provided to NJDEP about PFC use at the PVDF manufacturing facility located in Thorofare (West Deptford), NJ indicate that 86.6% of the 125,069 kg of the Surflon S-111 PFC mixture (primarily PFNA) used between 1991-2010 was released to the environment (air and water) (Roux Associates Inc., 2013). The environmental fate of PFNA is discussed below.

The manufacture and use of PFOA, PFNA, and other long-chain perfluorinated carboxylates is currently being phased out by eight major manufacturers through a voluntary stewardship agreement with USEPA, with the intent to reduce global facility emissions and product content of these chemicals by 95% by 2010, and with the ultimate goal of eliminating emissions and product content by 2015 (USEPA, 2010, 2012a). The manufacturer of PVDF at the facility located in Thorofare is a participant in the voluntary stewardship agreement. However, other manufacturers of long-chain PFCs that are not participants in the voluntary stewardship agreement continue to manufacture these compounds, in the U.S. and particularly overseas (USEPA, 2009; Lindstrom et al., 2011). It is not known if PFNA is produced by manufacturers that are not part of the voluntary stewardship agreement with USEPA.

Data provided to NJDEP show that Surflon S-111, the PFC mixture consisting primarily of PFNA, was not used in 2011-2012 at the PVDF manufacturing facility located in Thorofare, NJ (Roux Associates Inc., 2013). In 2010, only 171 kg were used, compared to 6,341-8,467 kg/year in each of the previous 10 years.

#### Evaluations by other government agencies

No health-based guidance values or standards have been developed for PFNA by U.S. federal agencies including USEPA, U.S. states, or other nations.

The European Chemical Agency (ECHA) Risk Assessment Committee finalized its harmonized classification and labeling opinion (CLH) for PFNA in September 2014 (ECHA, 2014). The ECHA classifications are related to hazard identification and qualitative weight of evidence for various endpoints and do not include dose-response, quantitative risk assessment, or criteria development. ECHA concluded that PFNA is a presumed human reproductive toxicant for damage to the unborn child; a suspected human reproductive toxicant for fertility effects; a suspected human carcinogen; causes specific target organ toxicity to liver, thymus, and spleen after prolonged or repeated exposure; and causes harm to the breast-fed child through effects on or via lactation. These conclusions are based on data on PFNA itself, as well as supporting information

from PFOA, to which it is closely related. The background document for the ECHA classification of PFNA was prepared by the Swedish Environmental Agency (Swedish Environmental Agency, 2013).

#### ENVIRONMENTAL SOURCES, FATE, AND OCCURRENCE

Because of the extreme stability of their carbon—fluorine bonds, PFCs are extremely persistent in the environment. PFCs are highly water-soluble in comparison with other well-studied persistent and bioaccumulative organic pollutants which have much lower water solubilities, such as polychlorinated dioxins and PCBs (Post et al., 2013). Although the production and use of PFNA is being phased out by major U.S. manufacturers, environmental contamination and human exposure to PFNA are anticipated to continue for the foreseeable future due to its persistence, formation from precursor compounds (discussed below), and the potential for continued production by other manufacturers in the U.S. and/or overseas (USEPA, 2009; Lindstrom et al., 2011).

PFCs including PFNA are found in environmental media, including wildlife, in worldwide locations including remote polar regions. In addition to release from industrial facilities where it is made or used, an additional source of PFNA and other PFCs in the environment is the breakdown of precursor compounds such as fluorotelomer alcohols (FTOH), used industrially and in consumer products (Butt et al., 2010; Buck et al., 2011).

The fluorotelomer alcohol 8:2 FTOH [CF<sub>3</sub>(CF<sub>2</sub>)<sub>7</sub>CH<sub>2</sub>CH<sub>2</sub>OH] is converted to some extent to both PFNA and PFOA through non-biological chemical reactions in the atmosphere (Ellis et al., 2004) and through metabolic reactions in soil bacteria and in fish (Butt et al., 2014).

Polyfluoroalkyl phosphoric acid diesters such as diPAPs 8:2 (larger molecules found in grease proof food contact papers, wastewater treatment plant sludge, and paper fibers from paper mills; D'eon et al., 2009) release FTOH that can degrade to PFCs. Fluoroacrylate polymers, used in commercial products, may also degrade in soil to release FTOH (Russell et al., 2008; Washington et al., 2009). Since PFNA and other PFCs do not degrade appreciably, environmental PFC levels are increased by even a small rate of conversion of the precursors to the terminal PFC product.

Two major pathways have been proposed for long-range transport of PFCs such as PFNA to remote locations worldwide (Lau et al., 2007; Butt et al., 2010). The relative contribution of each of these pathways is not known. The first pathway involves the atmospheric transport of volatile precursors, such as FTOH, followed by oxidation to PFCs (e.g. PFOA and PFNA) which are then deposited onto the land or the water. The second pathway involves long-range aqueous transport of perfluorinated carboxylates such as PFOA and PFNA in their anionic forms to remote locations by currents on the ocean's surface.

#### Drinking Water

As discussed above, large amounts of PFNA were discharged to air, soil, and surface water at facilities where it was used as a processing aid in the production of the fluoropolymer PVDF (Prevedouros et al., 2006; Roux Associates Inc., 2013). Like other ground water contaminants, PFCs that are released to the environment can reach drinking water wells via the well-established pathways of migration of a ground water plume that has been contaminated either directly from

surface spills and/or by contaminated surface water mixing with ground water drawn in by pumping wells. Air emission has also been established as a pathway for ground water contamination by the related compound, PFOA. In an industrial facility where PFOA was used as a processing aid in fluoropolymer production, ground water used for drinking water was contaminated up to about 20 miles from the emission source. This occurred by deposition from air onto soil, followed by migration through the soil to ground water (Davis et al., 2007). PFNA emitted to air from PVDF production facilities may reach ground water through the same pathway. This pathway, discussed further below, is being investigated as a possible source of PFNA in drinking water wells in the vicinity of a New Jersey PVDF production facility that emitted PFNA to air and water for about 25 years (Integral, 2013).

In addition to industrial releases, sources of PFCs found in ground water or surface water include: discharge from wastewater treatment plants that treat domestic and/or industrial waste; street- and storm water runoff; release of aqueous firefighting foams; and land application of biosolids or contaminated industrial waste (Post et al., 2013). Another source of PFCs in the environment is the biodegradation in soil, sludge, and wastewater of precursor compounds such as fluorotelomer alcohols (FTOH), as discussed above.

PFCs, including PFNA, have been found in raw and finished public drinking water from both ground and surface water sources in the U.S. and worldwide (Post et al., 2013; USEPA, 2014). Available information indicates that PFCs, including PFNA, are not removed from drinking water by conventional treatment processes, but may be removed by granular activated carbon, reverse osmosis, and possibly ion exchange treatment systems designed for this purpose (Rahman et al., 2013).

PFNA has been found less frequently and at lower concentrations than PFOA and PFOS in drinking water studies from the U.S. and around the world. Comparison of occurrence frequencies for PFNA among drinking water studies is complicated by the fact that the reporting levels in these studies vary widely. In a literature review of drinking water occurrence studies worldwide (Post et al., 2013), the highest reported concentration of PFNA outside of Gloucester County, NJ was 58 ng/L in Catalonia, Spain (Ericson et al., 2009).

Post et al. (2013) reported on a study of the occurrence of PFCs in raw water from 31 NJ public water supplies (29 sampled by NJDEP in 2009, and two sampled by a water company in 2010-2013 using the same laboratory and method). In this study, PFNA was found in three NJ ground water sources at concentrations (72-96 ng/L) higher than the highest raw or finished drinking water level (58 ng/L) reported elsewhere in the studies located in the literature. At these three NJ sites, PFNA was the sole or predominant PFC detected, whereas PFNA was a minor component of a mixture of PFCs when it was reported in drinking water at locations elsewhere in the world.

The highest PFNA concentration (96 ng/L) reported in the 2009 NJDEP drinking water study was at a public water supply well (Paulsboro Water Department) in southern NJ about 2 miles from the West Deptford, NJ facility that used and discharged PFNA from 1985 until 2010 (Post et al., 2013). In follow-up sampling of this well in 2013, PFNA was found at 140 ng/L in raw water and 150 ng/L in finished water (Post et al., 2013). This well is currently not in use, and installation of treatment to remove PFCs from this well is planned. PFNA levels in another recently constructed well of this public water supply were lower (< 20 ng/L) in September 2013 testing. PFNA data are not available from two other wells of this water system which were

used only on a limited basis until May 2012 and are not currently in use. PFNA was also detected at up to 72 ng/L in wells of a second public water supply (NJ American Logan-Birch Creek) located about 10 miles from the industrial facility (Post et al., 2013). The presence of PFNA (80 ng/L) reported at a third site by Post et al. (2013), located in northern NJ, was not confirmed in follow-up sampling in 2013.

In further public water supply sampling reported to NJDEP through March 2014, PFNA was also found in a public water supply well in West Deptford, within the same township as the industrial facility, at up to 48 ng/L in 2013, and in wells of 5 other Gloucester County public water supplies at up to 50 ng/L.

Under the USEPA Unregulated Contaminant Monitoring Rule 3 (UCMR3; USEPA, 2012b), nationwide monitoring of finished water for 30 unregulated contaminants, including PFNA and 5 other PFCs, is being conducted in 2013–2015 by all U.S. public water supplies serving more than 10,000 people and 800 representative PWS serving less than 10,000 people. Comparison of the UCMR3 PFC occurrence data with other PFC occurrence studies is complicated by the fact that the Reporting Level for UCMR3 monitoring of PFNA (≥ 20 ng/L) is much higher than the Reporting Levels in the NJDEP studies and other monitoring data reported to NJDEP and in the drinking water occurrence studies reported in the literature (generally < 5 ng/L, reviewed by Post et al., 2013). In initial UCMR3 data from 3483 public water supplies outside of New Jersey reported to USEPA through January 2015, PFNA (20 ng/L or above) was found in only seven public water systems outside of New Jersey (USEPA, 2015; Table 1). As of January 22, 2015, PFNA was found in UCMR3 monitoring in three public water supplies sites in Gloucester County, NJ (Woodbury City Water Department, up to 56 ng/L; Monroe Township MUA, up to 28 ng/L, West Deptford Township Water Department, 30 ng/L) including one public water supply (Monroe Township MUA) which had not previously reported detections of PFNA to NJDEP. In all but two of the non-NJ public water supplies reporting PFNA in UCMR3, other PFCs were also present, while PFNA was the only PFC reported at the three Gloucester County, NJ, sites.

Table 1. New Jersey versus national PFNA detections (≥20 ng/L) in public water supplies in initial UCMR3 results

<del></del>	1 1					
New Jers	sey	National (other	than NJ)			
(as of 1/22	2/15)	(as of January 2015)				
Number of PWS	% of PWS	Number of PWS	% of PWS			
3/122	2.5%	6/3483	0.2%			

In private well testing results reported to NJDEP as of July 18, 2014, PFNA (at  $\geq$  2.5 ng/L) was detected in wells at 26 of 94 (28%) of residences tested in the vicinity of the West Deptford industrial facility. Fifteen of the wells had PFNA levels above 20 ng/L, and the highest concentration found was 1,500 ng/L. Point of entry treatment systems (POETS) have been installed on those wells with PFNA levels of  $\geq$  20 ng/L that are currently used for potable purposes.

#### Ambient Surface Water

In 2007–09, PFNA was found in the Delaware River water at up to 976 ng/L starting near and downstream of the discharge location of the above-mentioned industrial facility; this is higher than the surface water concentrations elsewhere in the U.S. and worldwide in studies located in the literature. Elevated levels of PFUnDA (C11), a component of the Surflon S-111 mixture

used at the facility, were also found in the Delaware River at these same locations (DRBC, 2012).

#### Wildlife

PFCs with eight or more fluorinated carbons (PFNA and longer chain carboxylates, PFOS and longer chain sulfonates) are bioaccumulative in fish, while shorter chain-length PFCs are not (Conder et al., 2008). PFNA and other PFCs are found in biota, including marine mammals and other species, worldwide including in remote Arctic and Antarctic regions. The presence of PFCs in these species is believed to result from exposure both to these compounds and to precursors that are metabolized to PFCs (Houde et al., 2011).

In a study of PFC levels in blood taken in 2003 from bottlenose dolphins in Bermuda, the East and West coasts of Florida, Charleston, SC, and Delaware Bay, NJ, the mean PFNA level in Delaware Bay dolphins (326 ng/g) was much higher than at the other sites (13-63 ng/g) (Houde et al., 2005). These higher levels in Delaware Bay may have resulted from discharges of PFNA from local industrial sources.

In 2004-07, PFNA and PFUnDA levels were elevated in fillets from white perch and channel catfish from the same Delaware River locations where elevated levels were found in surface water in 2007−2009 (DRBC, 2009). In more recent data from 2010 and 2012 at these Delaware River locations, PFNA was not detected (≥ 0.25 ng/g, 2010; ≥ 0.5 ng/g, 2012) (DRBC, personal communication). Liver and serum were not analyzed in these studies.

## **HUMAN BIOMONITORING**

#### Human Serum

PFNA is one of four PFCs [PFOA, PFOS, PFNA, perfluorohexane sulfonate (PFHxS)] that are detected in the serum of greater than 99% of a representative sample of the U.S. population in National Health and Nutrition Examination Survey (NHANES) conducted by the U.S. Centers for Disease Control and Prevention (CDC; Kato et al., 2011); PFCs are also ubiquitous in the serum of populations worldwide (reviewed in Lau, 2012; Post et al., 2012). These four PFCs are biologically persistent, with human half-lives of several years, as discussed in detail in the Toxicokinetics section below.

In the U.S population as a whole, serum levels of PFNA are generally lower than for the other three ubiquitous PFCs. In the most recent NHANES data from 2011-12 (CDC, 2015), geometric mean serum levels were PFNA, 0.88 ng/ml; PFOA, 2.08 ng/ml; PFOS, 6.31 ng/ml; and PFHxS, 1.28 ng/ml. Based on the infrequent occurrence of PFNA reported in U.S. public drinking water supplies in UCMR3 and other studies (discussed above), it is unlikely that the mean and median PFNA serum levels found in the U.S. general population in NHANES are influenced by drinking water exposures. To further verify this conclusion, local health officers from several counties reporting PFNA in UCMR3 through July 2014 were contacted by the Health Effects Subcommittee. Several of these counties reported that they had no information indicating that their location participated in NHANES in 2011-12, while one county was not contacted because it did not have a health department.

Table 2. Geometric mean and 95% confidence interval and selected percentiles of PFOS, PFOA, PFHxS, and PFNA serum concentrations (ng/mL) for the U.S. population 12 vears of age and older: Data from NHANES 2011-2012 <sup>a</sup>

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Geometric Mean (95% Confidence				Selected Pero	centiles	
	\ \ \	erval)	50 <sup>th</sup>	75 <sup>th</sup>	90 <sup>th</sup>	95 <sup>th</sup>
PFHxS	1.28	1.05-1.43	1.27	2.26	3.81	5.43
PFOS	6.31	1.04-6.84	6.51	10.48	15.62	21.68
PFOA	2.08	1.03-2.22	2.08	3.02	4.35	5.67
PFNA	0.88	0.81-0.97	0.86	1.30	1.95	2.54

<sup>&</sup>lt;sup>a</sup> CDC (2015)

In another series of studies of PFC serum levels in U.S. blood donors, the geometric mean from the most recent data (2006) was 0.97 ng/ml (Olsen et al., 2011). Median PFNA serum levels in the epidemiology studies of the general population from around the world that are reviewed in the <u>Human Studies</u> section below ranged from 0.3 ng/ml to 2.36 ng/ml. As discussed below, the lower median values are from studies of European populations, and the two highest median values (2.3 and 2.36 ng/ml) are from Taiwanese studies. A number of other studies of general population human serum levels of PFNA from locations worldwide, which did not assess associations with health endpoints, are not reviewed herein.

In data from 2001-02 NHANES (Kato et al., 2009), PFNA and other PFCs in pooled serum samples from male and female children, age 3-5 and 6-11 years, of non-Hispanic white, non-Hispanic black, and Mexican-American ethnicity were generally similar in both age categories and both genders, with some differences among racial and ethnic groups.

#### Human Breast Milk

PFNA and other PFCs have been found in human breast milk in the general population of the U.S. and other nations. Fujii et al. (2012) sampled breast milk from 90 women (30 each from Japan, Korea, and China) and compiled these results, as well as data from other studies conducted worldwide that had been reported in the literature. Detection frequencies and concentration ranges for PFNA in these studies varied widely, with some studies finding no samples with PFNA above a detection limit of 8.8 ng/L while other studies reported maximum levels of >100 ng/L. In the only study conducted in the U.S. (Tao et al., 2008), PFNA was found at >5.2 ng/L in 13 of 45 (29%) of breast milk samples collected in Massachusetts in 2004, with a mean of 7.26 ng/L, a median of 6.97 ng/L, and a maximum of 18.4 ng/L.

#### Human Seminal Fluid

PFNA and other PFCs were found in human seminal fluid in a study of Sri Lankans (2005). The mean and median concentrations were 0.007 and 0.005 ng/ml, respectively, and concentrations were significantly correlated with serum PFNA concentrations (Guruge et al., 2005).

#### SOURCES OF HUMAN EXPOSURE

Sources of human exposure to PFCs include drinking water, food, food packaging, carpets, upholstery, and clothing treated for water and stain resistance, house dust, protective sprays and

waxes, and indoor and outdoor air. Since PFNA bioaccumulates in fish, consumption of contaminated fish in locations where PFNA has been discharged into surface waters is a potential exposure route. The primary use of PFNA is as a processing aid in the production of PVDF, a material which is not used as widely in consumer products as the materials made with some other PFCs. However, humans may be exposed to PFNA formed from telomer alcohols in environmental media (discussed above) and by metabolism of telomer alcohols in the human body (Henderson and Smith, 2007; Nillson et al., 2010; reviewed by Butt et al., 2014). Telomer alcohols and their precursors, such as polyfluoroalkylphosphoric acid diesters (diPAPs), have been used in consumer products such as greaseproof food packaging paper.

In contrast to other persistent and bioaccumulative organic compounds that are not water-soluble, ingestion of contaminated drinking water can be an important source of human exposure to PFCs. Elevated serum levels of PFOA, PFOS, and PFHxS have been found in communities with contaminated private wells and/or public water supplies. However, no studies of serum levels in communities exposed to PFNA in drinking water have been conducted. Because of their long half-lives in the body, ongoing exposure to even relatively low drinking water concentrations of biologically persistent PFCs substantially increases total human exposure. For example, ongoing drinking water exposure to PFOA increases PFOA serum levels with a serum:drinking water ratio of 100:1 or greater (Emmett et al., 2006; Post et al., 2012; discussed in detail below). Consistent with their higher daily water consumption rate (ml/kg/day), serum levels are generally higher in young children than in adults exposed to the same PFC concentration in drinking water (Emmett et al., 2006; Mondal et al., 2012).

Because PFNA exists in drinking water in its non-volatile anionic form, inhalation exposure is not expected from non-ingestion uses of drinking water such as showering, bathing, laundry, and dishwashing. In contrast, these are important exposure routes for volatile drinking water contaminants. Similarly, dermal absorption of PFNA during showering and bathing is insignificant compared to exposure through ingestion (NJDOH, 2014). The evaluation was based on skin permeability data for PFOA (Franko et al., 2011), a compound which is expected to have a slightly higher potential for dermal absorption than PFNA.

Commercially available infant formula products does not appear to be a major source of exposure to PFNA or other PFCs in the U.S. Tao et al. (2008a) evaluated PFCs in 21 samples of 5 brands of infant formula representing >99% of the U.S. market. Products tested included milk-, organic-, and soy-based formula, packed in cans, glass, or plastic, in liquid, powdered, and concentrated liquid forms. PFNA was not detected (<2.2 ng/L) in any sample. Other PFCs (for which detection levels varied) were also not detected (PFOA, PFBS, PFHpA) or were infrequently found (PFOS – one detection at 11.3 ng/L; PFHxS-two detections at up to 3.59 ng/L). In this study, PFCs were also analyzed in 12 samples of 11 brands of dairy milk purchased in Albany, NY in 2008, with only one detection of PFHxS at 3.83 ng/L.

## **TOXICOKINETICS**

#### Absorption

PFCs, including PFOA which differs from PFNA by only one fluorinated carbon, are generally well absorbed orally (Lau, 2012; Post et al., 2012). While oral absorption of PFNA has not been quantitatively evaluated, oral absorption occurs rapidly as indicated by its presence in serum in rodents soon after oral administration (Tatum-Gibbs et al., 2011).

Ammonium perfluorononanoate, the ammonium salt of PFNA, was absorbed by inhalation when generated as a dust, as demonstrated by its acute toxicity in rats exposed by this route (Kinney et al., 1989).

No information on the extent of dermal absorption of PFNA was located. PFOA penetrated rat and human skin in an *in vitro* system (Fasano et al., 2005), and caused liver toxicity in rats (Kennedy, 1985) and immune effects in mice (Fairley et al., 2007), after dermal exposure. The dermal permeability coefficient of PFOA (14,000 ng/L [14  $\mu$ g/L] in water, pH 5.01) was estimated as 8.8 x 10<sup>-5</sup> cm/hr (Fasano et al., 2005). The permeability coefficient of PFNA is expected to be close to, but slightly less than that of PFOA (F. Frasch, personal communication).

#### Distribution and Metabolism

Like other PFCs, PFNA is chemically non-reactive and is not metabolized (Lau et al., 2012).

PFNA is primarily distributed to serum, kidney, and liver. After repeated administration to mice and rats, liver concentrations are higher than serum concentrations, while concentrations in the kidney are lower than in the serum (Tatum-Gibbs et al., 2011).

PFCs in general have an affinity for binding to proteins. Available information indicates that PFNA, like other PFCs, is almost totally bound to albumin and other proteins in the serum (Lau, 2012). PFNA was found to bind (>98%) to plasma proteins *in vitro* (Ohmori et al., 2003).

#### Excretion

PFCs, including PFNA, are excreted in urine and feces, with the rate of excretion generally decreasing with increasing carbon chain length (Lau, 2012).

#### **Rodents**

The toxicokinetics of PFNA and PFOA have been studied in mice and rats, and half-lives in these species are shown in Table 1. PFNA is excreted several-fold more slowly than PFOA in both genders of both of these rodent species.

Both PFOA and PFNA are slowly excreted in both male and female mice and in male rats, with much more rapid excretion for both PFCs in female rats. In these species and genders, estimates of PFNA half-lives were 2 to 30-fold longer than for PFOA. Rates of fecal elimination are slow, and are similar in male and female rats (Kudo et al., 2001). The differences in excretion rates between genders are believed to result from gender differences in renal organic anion transporters (OATs) that control urinary excretion rates. These proteins are responsible for the active transport (secretion or reabsorption) of many organic anions into and out of the kidney and other organs (Han et al., 2012; Weaver et al., 2010). In rats administered 20 mg/kg/day by intraperitoneal injection for 5 days, castration reduced the levels of PFNA in the liver, while PFNA levels in the livers were not decreased in castrated rats that were treated with testosterone (Kudo et al., 2000). These results suggest that the rapid excretion of PFNA in male rats is dependent on testosterone.

In pharmacokinetic studies of linear (*n*-) and branched (*iso*-) PFNA after a single-dose (male rats only; Benskin et al., 2009) and with subchronic dosing (males and females dosed for 12 weeks; De Silva et al., 2009), the linear form was excreted somewhat more slowly than the branched form. Half-lives were similar to those in the studies shown in Table 3. The half-lives

in male rats were 41-48 days for linear PFNA and 21-32 days for branched PFNA, while the half-lives in females were 2.1 days for linear and 0.82 days for branched PFNA. In the male rats in these studies, the half-lives of PFNA were 3-5 times longer than for PFOA, based on comparison of groups treated with the same isomer for the same time period.

PFNA has been measured in urine and feces in several of the rat pharmacokinetic studies (Kudo et al., 2001; Benskin et al., 2009; De Silva et al., 2009; Mertens et al., 2010). Because urinary excretion of PFNA is very slow in male rats (discussed above), fecal excretion becomes proportionally more significant as compared to female rats in which urinary excretion is rapid. In male rats, a large percentage (65-68%; Benskin et al., 2009) is excreted in the feces (Kudo et al., 2001; Benskin et al., 2009).

Table 3. Half-lives of PFNA and PFOA in Male and Female Mice and Rats (days)

					PFNA.	: PFOA	
	PF	NA .		PFOA	t <sub>1/2</sub> Ratio		
	Male	Female	Male	Female	Male	Female	
Rat	30.6 <sup>a</sup> /29.6 <sup>b</sup>	$1.4^{a}/2.4^{b}$	4-6°	0.08-0.17 <sup>c</sup>	5.0-7.5	8.2-30	
Mouse	34.3 <sup>a</sup> /68.4 <sup>b</sup>	25.8 <sup>a</sup> /68.9 <sup>b</sup>	17 <sup>c</sup>	19 <sup>c</sup>	2.0-4.0	1.4-3.6	

<sup>&</sup>lt;sup>a</sup> Tatum-Gibbs et al. (2011).

#### Humans

Data on the human half-life of PFNA are extremely limited. Human half-lives of several PFCs (PFOA, PFOS, PFHxS, PFBS, PFBA) have been estimated from data on declines in serum levels after occupational or drinking water exposures ended (summarized in Lau et al., 2012 and Post et al., 2012). For PFNA, no such data are available.

Zhang et al. (2013a) estimated the human half-lives of a series of PFCs, including PFOA and PFNA, based on renal clearance estimates. In women less than 50 years old, modeled excretion through menstrual blood loss was also considered. The study included 86 adults (age 21-88 years) from the Chinese general population. The median serum PFNA concentration in the subjects was 0.37 ng/ml, which was several fold lower than the median of 1.5 ng/ml in the 2007-08 NHANES (Kato et al., 2011). Renal clearance estimates for each PFC in each participant were based on paired urine and blood or serum measurements. The PFNA half-life estimates in males and older females for PFNA (n=50) ranging from 0.34 to 20 years, while for PFOA (n=66), the range was 0.059 to 14 years. In younger females, the range for PFNA (n=16) was 0.38 to 7.7 years and for PFOA (n=20) was 0.19 to 5.2 years.

Available data indicate that blood loss (e.g. through menstruation, blood donation, or venesection) is an excretion route for PFCs (Harada and Koizumi, 2009; Taylor et al., 2014; Lorber et al., 2015; MDH, 2013). The estimates of PFNA half-life in women under 50 years of age are based on modeling of this pathway and are considered more uncertain than the estimates for men and older women. Although children were not included in this study, the increased excretion rate due to menstrual blood loss is not applicable to children. Similarly, the additional clearance through menstrual blood is not relevant to pregnant women. Other potential clearance pathways, such as fecal excretion, were not considered by Zhang et al.

<sup>&</sup>lt;sup>b</sup> Ohmori et al. (2003).

<sup>&</sup>lt;sup>c</sup> Reviewed in Post et al. (2012).

(2013a), but were believed by the researchers to be less significant than elimination through urine and menstrual blood.

Median and geometric mean values represent estimates of the 50<sup>th</sup> percentile value and are less affected by outliers than mean values. As shown in Table 4, the ratios of estimated half-lives for PFNA and PFOA in men and older women, based on medians and geometric means, are 2.06 and 2.67 years, respectively. For younger women for whom menstrual clearance was modeled, the estimated ratios are closer to 1. As noted above, the estimates for younger women are more uncertain than the estimates for men and older women.

In summary, while the half-lives estimated by urinary clearance are less definitive than those based on serum level declines, these results support the conclusion that PFNA is more persistent in humans than PFOA. A longer human half-life of PFNA as compared to PFOA is consistent with the toxicokinetic data from rodents.

Table 4. Estimated half-lives of PFNA and PFOA in Humans (years)

	PFNA PFOA			PFNA:1 t <sub>1/2</sub> Ro		
Based on decline in serum levels	on decline in serum  No information  2.3-10.1 <sup>a</sup> /3.8 <sup>b</sup> years					
Based on urinary excretion, with estimated menstrual clearance in females <50 years of age <sup>c</sup>	all males and females >50 years:	females 21-50 years:	all males and females >50 years:	females 21-50 years:	all males and females >50 years:	females 21-50 years:
Mean	4.3	2.5	2.6	2.1	1.65	1.19
Geometric Mean Median	3.2	1.7 1.5	1.2 1.7	1.5 1.8	2.67 2.06	1.13 0.83

<sup>&</sup>lt;sup>a</sup>Multiple studies reviewed in Post et al. (2012) – communities with drinking water exposures.

#### Fetal exposure - Maternal and cord blood serum levels

Fetal exposures to PFNA are important because developmental effects are among the most sensitive toxicological endpoints for PFNA in animals (see <u>Toxicology</u> section below). PFNA, like other PFCs, is transferred from the mother to the fetus in animal studies (Das et al., 2015; Wolf et al., 2010). Like other PFCs, PFNA is found in human umbilical cord blood (reviewed below), placenta, and amniotic fluid (Stein et al., 2012; Zhang et al., 2013b), thereby demonstrating that maternal- fetal transfer also occurs in humans.

In human studies, PFNA levels in fetal cord blood serum generally correlate with maternal serum levels. In nine studies in which both maternal and cord blood PFNA levels were measured, the mean cord blood serum:maternal serum (or plasma) ratios ranged from about 0.3 to about 1, with a median value of about 0.5 (Fromme et al., 2010; Zhang et al., 2013b; Ode et al., 2013; Beesoon et al., 2011; Kim et al., 2011; Liu et al.,

<sup>&</sup>lt;sup>b</sup>Olsen et al. (2007) - retired workers.

<sup>&</sup>lt;sup>c</sup>Zhang et al. (2013) – Chinese general population.

2011a; Needham et al., 2011: Gutzkow et al., 2011; Monroy et al., 2008).

#### Infant Exposure – Distribution to Human Breast Milk

Infants drink much more fluid (breast milk or formula which may be prepared with drinking water) on a body weight basis than older children and adults, and the intake rate is highest in the youngest infants. For example, the mean drinking water intakes in infants who consume drinking water are 137 ml/kg/day from birth to 1 month of age, and 53 ml/kg/day from 6-12 months of age (USEPA, 2008). For breast fed infants, mean breast milk intakes in these age groups are 150 ml/kg/day from birth to 1 month of age and 83 ml/kg/day from 6-12 months of age (USEPA, 2008). In contrast, the mean daily drinking water intake is 13 ml/kg/day for children 11 or more years of age and adults (USEPA, 2008) and 26 ml/kg/day for lactating women (USEPA, 2004). Thus, infants who consume formula prepared with contaminated drinking water receive a higher dose of the contaminant than older children and adults. Breast-fed infants will also receive higher exposures than older children and adults for contaminants that are transferred to breast milk at concentrations even several-fold below the concentration in the drinking water source.

As discussed in <u>Human Biomonitoring</u> above, PFNA is found in human breast milk. The importance of breast milk as a route of exposure of PFNA and other PFCs is illustrated by the data of Fromme et al. (2010) (Table 5). Maternal and cord blood serum PFNA concentrations were studied in 53 German mothers at birth and in their breast-fed infants. Although mean and median infant (cord blood) serum levels were less than in maternal serum at birth, serum PFNA increased at 6 months to levels higher than in maternal serum, presumably from exposure through breast milk. At age 19 months, a time point at which breast feeding had stopped or was decreased, serum levels had decreased to close to maternal levels, presumably due to decreased exposure on a body weight basis, combined with dilution due to rapid growth. Similar findings would be expected in infants who are fed with formula prepared with drinking water contaminated with PFNA rather than with breast milk, assuming that the PFC concentrations in the drinking water are the same as in the breast milk.

Table 5. PFNA (ng/ml) in serum from 53 mother:infant pairs<sup>a</sup>

		Mother			Fetus/infant				
	Pregnancy	At delivery	6 months after	Cord blood	6 months after	19 months			
			delivery		birth	after birth			
N (% > LOQ)	44 (86)	38 (83)	47 (83)	33 (30)	40 (90)	24 (83)			
Mean	0.8	0.8	0.7	0.4	1.1	0.7			
Median	0.6	0.6	0.5	< 0.4	1.0	0.6			
95 <sup>th</sup> percentile	2.8	3.0	2.0	1.5	2.3	1.4			

<sup>&</sup>lt;sup>a</sup> Fromme et al., 2010

al., 2013).

Relationship between PFC drinking water concentrations and serum levels

Because PFNA and other persistent PFCs are stored in the serum of humans with a half-life of several years, human serum levels are a reliable and stable measure of internal dose. In communities with drinking water supplies contaminated by PFOA and other persistent PFCs (PFOS and PFHxS), mean and median serum PFC levels were elevated above means and medians in the general population (reviewed in Post et

For persistent compounds, the relationship between daily intake (as expressed either as a dose (ng/kg/day) or a concentration in drinking water (ng/L)) and body burden (as measured by serum levels (ng/ml), in the case of PFCs) is proportional to the half-life (USEPA, 2003). Thus, the serum:drinking water ratio for persistent PFCs is expected to be proportional to their half-lives.

#### **PFOA**

The relationship between drinking water concentration and serum concentration has been extensively evaluated for PFOA. It is well established that ongoing human exposure to PFOA in drinking water increases serum levels, on average, by ≥100 times the drinking water concentration. As discussed below, this ratio is supported by data from several studies of populations whose public water supplies or private wells were contaminated with a wide range of PFOA concentrations (60 ng/L to 13,300 ng/L), as well as three toxicokinetic modeling efforts (Emmett et al., 2006; Hoffman et al., 2011; Clewell, 2006, 2009; Post et al., 2009a, 2009b, 2012; Worley and Fisher, 2015).

Although upper percentile exposure factors are typically used in risk assessment, 100:1 represents a central tendency (or lower) estimate for the ratio in exposed populations. The ratio can be higher or lower among individuals due to differences in daily water consumption rates and physiological parameters related to excretion rate.

Emmett et al. (2006) reported a median ratio of 105:1 in residents of Little Hocking, Ohio age 6 years or older who were exposed to 3,550 ng/L (3.55  $\mu$ g/L) in their drinking water, with a 25%-75% interquartile range of 62:1-162:1. For six individuals with private wells included in this study, the ratios ranged from 142:1 to 855:1 (Emmett et al., 2006). Post et al. (2009a) evaluated five other Ohio and West Virginia communities with lower drinking water concentrations ( $\geq$  60 ng/L) in the same vicinity and found ratios of 100:1 to 330:1 in the four communities for which reliable estimates can be made based on a relatively narrow range of reported PFOA drinking water concentrations.

A ratio of ≥100:1 is also supported by data from several other studies. In 108 users of contaminated private wells with mean and maximum PFOA levels of 200 ng/L and 13,300 ng/L in the same Ohio/West Virginia region discussed above (Hoffman et al., 2011), the estimated ratio was 141:1 (95% CI: 135:1–148:1) based on regression modeling, and 114:1 based on a one-compartment toxicokinetic model. The 100:1 ratio is also consistent with observations in 98 Minnesota residents tested 34 months after exposure to contaminated drinking water ended if the expected post-exposure decline in serum levels is considered (MDH, 2009).

A lower serum:drinking water ratio of approximately 50:1 was observed in a German community whose drinking water source was contaminated with PFOA and other PFCs (Hölzer et al., 2008). Possible reasons for this difference are the use of bottled water by some participants who were aware of the contamination for up to 6 months before their blood was sampled, uncertainty about the duration and time course of the water contamination, or differences in drinking water consumption patterns between German and U.S. residents.

Clewell (2006, 2009) developed a factor, 0.127 (ng/kg/day)/(ng/ml), that relates intake of PFOA (ng/kg/day) and human serum level (ng/ml). The factor was derived from a pharmacokinetic

model and was validated with data from the exposed community in Little Hocking, Ohio. Using average daily water intake recommended by USEPA (2004) of 17 ml/kg/day, application of this factor predicts a serum:drinking water ratio of 133:1.

This observed serum:drinking water ratio of approximately 100:1 is also in agreement with a one-compartment model (Harada et al., 2005) which predicts that ingestion of 0.0017  $\mu$ g/kg/day would result in serum levels of 13  $\mu$ g/L in males and 8  $\mu$ g/L in females, or a mean of 10.5  $\mu$ g/L. Assuming a drinking water intake of 17 ml/kg/day (USEPA, 2004), a dose of 0.0017  $\mu$ g/kg/day would result from a water concentration of 0.1  $\mu$ g/L. The ratio between a serum concentration of 10.5  $\mu$ g/L and this water concentration of 0.1  $\mu$ g/L is 105:1, identical to the median ratio reported by Emmett et al. (2006).

Finally, a serum:drinking water of approximately 100:1 is predicted by a recently developed physiologically based pharmacokinetic (PBPK) model that relates PFOA drinking water concentration to serum level. This model considers urinary clearance rates and partition coefficients in humans for fat, liver, and kidney reported in the literature, as well as the most current drinking water exposure parameters (Worley and Fisher, 2015).

#### **PFNA**

The toxicokinetic studies discussed above indicate that rodent half-lives for PFNA are 2 to 30-fold longer than for PFOA (Table 3), and that the median and geometric mean half-life of PFNA in humans (except in women of childbearing age) for PFNA is at least twice that of PFOA (Table 4). (PFC half-life estimates in women of childbearing age in this study include a modeling component and are more uncertain.) These animal and human data support an estimated half-life of PFNA at least twice that of PFOA. Additionally, as discussed above, a 100:1 ratio for PFOA likely underestimates the median value for this parameter. Taken together, this information indicates that an estimated serum:drinking water ratio of 200:1 for PFNA is not overly stringent.

Based on an assumed daily drinking water intake of 17 ml/kg/day (USEPA, 2004), the corresponding increase in daily dose of PFNA (ng/kg/day) that results in a 1 ng/ml increase in PFNA in blood serum is 0.085 ng/kg/day/(ng/ml). This value is derived as follows:

200 ng/ml PFNA in blood serum
(1 ng/ml PFNA in drinking water) x (17 ml/kg/day drinking water ingested)

= 11.8 ng/ml PFNA in blood serum ng/kg/day PFNA ingested

= 0.085 ng/kg/day/(ng/ml)

For comparison, the estimated daily dose of PFOA estimated to result in a 1 ng/ml increase in serum level (0.127 ng/kg/day/(ng/ml); Clewell (2006, 2009) is associated with a serum:drinking water ratio of 133:1. This estimated daily dose is 1.49 times the daily PFNA dose (0.085 ng/kg/day) estimated to increase the serum level by 1 ng/ml.

Based on the above toxicokinetic considerations, ongoing exposure to drinking water with 150 ng/L PFNA (the highest concentration reported in public drinking water in New Jersey or elsewhere) is estimated to increase PFNA serum levels, on average, by 30  $\mu$ g/L (30 ng/mL; ppb) in serum. This represents about a 34-fold increase from the general population geometric mean serum value of 0.88 ng/ml (CDC, 2015).

## **HEALTH EFFECTS**

## Human Studies

#### Overview

In total, 44 human epidemiology studies evaluating associations of PFNA with health endpoints were reviewed and are discussed below. An individual table summarizing the design, study populations, outcomes and exposures, results, and limitations of each of these studies is found in Appendix 2. All of these studies, with the exception of one study of occupationally exposed workers evaluated the general population, and none of them were conducted in communities known to have drinking water contamination with PFNA.

The epidemiology studies evaluated associations of PFNA with serum lipids; metabolic parameters including diabetes; effects on the immune system, thyroid, and reproductive system; liver enzymes; birth outcomes; and several other endpoints. Associations of cancer with PFNA have been investigated in one study. The studies were conducted on populations in the U.S. as well as several Asian nations, several European nations, and Canada. Populations from different studies may not be comparable due to differences in age, pregnancy status, basis for enrollment, and PFNA exposure ranges (see below), as well as nationality. Summary tables for some health outcome categories are included below (Table 6A-G).

The range of serum levels in the general population studies that evaluated these effects is lower than those which may result from exposure to drinking water contaminated from PFOA. Although exposure to workers was higher, the occupational study is limited in its ability to detect associations for reasons discussed above. Therefore, the available data are not sufficient to evaluate the potential for PFNA to impact these parameters at higher exposures such as may occur from ingestion of contaminated drinking water.

PFCs other than PFNA, including PFOA, PFOS, and PFHxS, are ubiquitously present in the serum of the general population at concentrations generally higher than PFNA (Lau et al., 2012). A general issue in interpretation of epidemiology studies of PFNA is co-exposure to other PFCs, which in some instances were highly correlated with PFNA. Although some of the studies controlled for co-exposure to other PFCs when evaluating associations with PFNA, many studies did not include this adjustment, limiting their ability to determine the independent impact of PFNA.

#### **General Population Studies**

A strength of the general population studies is their use of PFNA serum levels as the basis for exposure assessment. Because of the long human half-life of PFNA, serum levels at a single time do not rapidly fluctuate with short term variations in exposure and reflect long-term exposures (see <u>Toxicokinetics</u> section above). Serum levels thus provide an accurate measure of internal exposure for each study participant, an advantage over studies based on external exposure metrics such as drinking water concentrations.

Of the general population studies, 28 were cross-sectional and one included a cross-sectional component. A general limitation of cross-sectional studies is that they evaluate information on both exposure and outcome at the same point in time, limiting their ability to establish temporality.

#### Occupational Studies

Occupational studies are often considered useful for evaluating effects of environmental contaminants because exposure levels are generally higher than in the general population or in communities exposed through site-specific environmental contamination. However, the sole occupational study of PFNA has several important limitations (Mundt et al., 2007). Importantly, Mundt et al. (2007) used work history rather than serum PFNA data for exposure classification. Potentially relevant to the evaluation of this study, PFOA serum levels in the least exposed groups of workers in some occupational studies of PFOA production workers were well above the general population range (reviewed in Post et al., 2012); this may also have been the case for PFNA exposures in the group classified as having no exposure by Mundt et al. (2007). Associations of PFOA, as well as PFOS, with some clinical parameters, including cholesterol and liver enzymes, exhibit a steep dose-response curve in the lower exposure range found in the general population with a plateau at higher exposures such as those found occupationally. For dose-response curves of this type, even the least exposed workers may have exposure levels that fall on the plateau portion of the dose-response curve. Thus, workers at a facility who are assumed to be non-exposed may not necessarily represent an appropriate group for comparison with more highly exposed groups of workers within a facility (Post et al., 2012). Other limitations of this study are discussed as relevant to specific endpoints, below.

#### Studies in Exposed Community

To our knowledge, there have been no studies of populations exposed to PFNA through contaminated drinking water or other environmental media. It is relevant to note that extensive information from communities with drinking water contaminated with the closely related compound PFOA is available from the C8 Health Project. This is a community health study of approximately 70,000 Ohio and West Virginia residents with at least one year of exposure to drinking water contaminated with PFOA at  $\leq$ 50 ng/L to over 3000 ng/L (Frisbee et al., 2009; C8 Science Panel, 2014; reviewed in Post et al., 2012). This study is notable because of its large size, the wide range of exposure levels, and the large number of parameters evaluated. Associations of PFOA serum concentrations were reported for a number of health endpoints, some of which have not been evaluated for PFNA in humans, including two types of cancer (Barry et al., 2013; Vieira et al., 2013). For other health endpoints, no associations were found in the C8 Health Project population. C8 Science Panel reports and citations for peer- reviewed publications presenting the results of these studies are found at the C8 Science Panel website (http://www.c8sciencepanel.org/).

Table 6A. Summary of findings from epidemiologic studies of PFNA and serum lipids

Citation	Study Population	Study Details	TC	HDL	Non- HDL	LDL	TG
Fu et al.,	China, random selection	*Study Design: Cross-sectional					
2014	of attendees to health	*Study Size: n=133	a			a	a
	check-up clinic	*Study Population Age: 0-88 years				1	
	*	*Exposure (Median): 0.37 ng/mL					
Lin et al.,	General U.S. Population	*Study Design: Cross-sectional		adolescents			adolescents
2009	(NHANES, 99-2000 &	*Study Size: adolescents – n=474 / adults – n=969		↓ b /			b /
	03-2004)	*Study Population Age: 12-20 years; > 20 years		adults			adults
	,	*Exposure (Mean): 0.70 ng/mL; 0.81 ng/mL		b			b
Lin et al.,	Individuals with abnormal	*Study Design: Cross-sectional					
2013	urinalysis results from	*Study Size: 664 (246 w/ elevated blood pressure and 398 w/					
	population-based	normal blood pressure)					a
	screening program in	*Study Population Age: 12-30 years					
	Taiwan	*Exposure (Geo Mean): range 0.38-25.4 ng/ml, males – 1.19					
		ng/ml, females – 1.00 ng/ml					
Mundt et	Occupational, U.S. factory	*Study Design: Cross-sectional and retrospective cohort					
al., 2007		*Study Size: n=592					
		*Study Population Age: not stated	-	-		_	
		*Exposure (Median): not available					
Nelson et	General U.S. Population	*Study Design: Cross-sectional					
al., 2010	(NHANES, 03-2004)	*Study Size: n=416 to n=860	<b>1</b>		<b> </b>		
		*Study Population Age: <80 years					
		*Exposure (Median): 1.0 ng/mL					
Starling et	Norway, pregnant women,	*Study Design: Cross-sectional					
al., 2014	03-2004	*Study Size: n=891	b	↑ b		ь	a ,b
		*Study Population Age: not stated					
		*Exposure (Median): 0.39 ng/mL					

 $<sup>\</sup>uparrow$  = statistically significant increased association,  $\downarrow$  = statistically significant decreased association,  $\uparrow$  - = inconsistent positively associated finding (findings from different models resulted in both statistically and non-statistically significant associations),  $\downarrow$  - = inconsistent negatively associated finding, — = not statistically significant, [statistical significant determined at  $\alpha$ =0.05]

TC= total cholesterol, HDL= high density lipoprotein cholesterol, LDL=low density lipoprotein cholesterol, TG=triglycerides

<sup>&</sup>lt;sup>a</sup> Outcome log-transformed for use in linear regression; <sup>b</sup> Exposure log-transformed for use in linear regression

Table 6B. Summary of findings from epidemiologic studies of PFNA and select metabolic effects

Citation	Study Population	Study Details	Glucose	Insulin	HOMA	Diabetes	BM
Halldorsson	Denmark, mother-	*Study Design: Prospective birth-cohort					
et al., 2012	offspring pairs –	*Study Size: n=345					<b> </b>
	pregnant women	*Study Population Age: not stated					'.
	recruited 88-1989	*Exposure (Median): maternal 0.3 ng/mL					
Lin et al.,	General U.S.	*Study Design: Cross-sectional	adolescents	adolescents			
2009	Population	*Study Size: adolescents: n=474/ adults: n=969	— <sup>b</sup> /	↓ a, b /			
	(NHANES, 99-2000 &	*Study Population Age: 12-20 years; > 20 years	adults	adults a, b			
	03-2004)	*Exposure (Mean): 0.70 ng/mL; 0.81 ng/mL		a, u			
Lin et al.,	Individuals with	*Study Design: Cross-sectional					
2011	abnormal urinalysis	*Study Size: n=287					
	results from population-	*Study Population Age: 12-30 years		a	a		
	based screening	*Exposure (Median): 1.68 ng/mL					
	program in Taiwan						
Lind et al.,	Sweden, 2001-2004	*Study Design: Cross-sectional					
2013		*Study Size: n=1,016				<b> </b>	
		*Study Population Age: >=70 years				-	
		*Exposure (Median): 0.7 ng/mL					
Nelson et	General U.S.	*Study Design: Cross-sectional					
al., 2010	Population	*Study Size: n=416 to n=860					
	(NHANES, 03-2004)	*Study Population Age: <80 years					
		*Exposure (Median): 1.0 ng/mL					

 $<sup>\</sup>uparrow$  = statistically significant increased association,  $\downarrow$  = statistically significant decreased association,  $\uparrow$  - = inconsistent positively associated finding (findings from different models resulted in both statistically and non-statistically significant associations),  $\downarrow$  - = inconsistent negatively associated finding, — = not statistically significant, [statistical significant determined at  $\alpha$ =0.05]

Insulin= defined as proinsulin/insulin ratio or serum insulin, HOMA=homeostasis model assessment of insulin resistance, BMI= body mass index <sup>a</sup> Outcome log-transformed for use in linear regression; <sup>b</sup> Exposure log-transformed for use in linear regression

Table 6C. Summary of findings from epidemiologic studies of PFNA and immune system outcomes

Citation	Study Population	Study Details	Vaccine Response	Common Cold:GI	Asthma	IM	AD
Dong et	Taiwan, 2009-2010	*Study Design: Case-control					
al., 2013		*Study Size: Asthmatics n=231 and non-asthmatics n=225					
		*Study Population Age: 10-15 years			1	↑	
		*Exposure (Median): Cases (1.0 ng/mL) and Controls (0.8					
		ng/mL)					
Granum et	Norway, 2007-2008,	*Study Design: Prospective birth cohort		Common			
al., 2013	recruitment from	*Study Size: n=56-99		Cold			
	mother-child cohort	*Study Population Age: Children 3 years	<b>↓-</b>	<b>↑-</b>			
		*Exposure (Median): 0.3 ng/mL		(GI)			
Humblet et	General U.S.	*Study Design: Cross-sectional					
al., 2014	Population	*Study Size: n=1,877					
	(NHANES, 99-2000	*Study Population Age: 12-19 years					
	& 03-2008)	*Exposure (Median): Medians ranges: 0.8-0.9 ng/mL					
Wang et	Taiwan, children of	*Study Design: Prospective birth cohort					
al., 2011	pregnant women	*Study Size: n=244				a, b	
		*Study Population Age: Birth through 2 years					
		*Exposure (Mean): 2.30 ng/mL					

 $\uparrow$  = statistically significant increased association,  $\downarrow$  = statistically significant decreased association,  $\uparrow$  - = inconsistent positively associated finding (findings from different models resulted in both statistically and non-statistically significant associations),  $\downarrow$  - = inconsistent negatively associated finding, — = not statistically significant, [statistical significant determined at  $\alpha$ =0.05]

IM= immunological markers which may include AEC (absolute eosinophil count, IgE (immunoglobulin E), and/or ECP (eosinophilic cationic protein); GI=gastrointestinal illness; AD= atopic dermatitis

<sup>a</sup>Outcome log-transformed for use in linear regression; <sup>b</sup>Exposure log-transformed for use in linear regression

Table 6D. Summary of findings from epidemiologic studies of PFNA and thyroid hormones and related outcomes. Page 1 of 2

Citation	Study Population	Study Details	TSH	TT4	FT4	TT3	TG	TD	Hypo	Hyper
Bloom et al., 2010	Subgroup of NY State sportfish	*Study Design: Cross-sectional *Study Size: n=31-38	a,b		b					
***************************************	anglers	*Study Population Age: 31-45 years *Exposure (Geo Mean): 0.79 ng/mL								
Jain, 2013	General U.S. Population (NHANES, 07-2008)	*Study Design: Cross-sectional *Study Size: n=1,733 *Study Population Age: > 12 years *Exposure (Median): not presented	a,b	a,b	a,b	— a,b (FT3): — a,b	a,b			
Ji et al., 2012	Korea, recruited from cohort study	*Study Design: Cross-sectional *Study Size: n=633 *Study Population Age: > 12 years *Exposure (Mean): 2.09 ng/mL	a,b	a,b						
Kim et al., 2011	South Korea, pregnant women from three clinics and paired infants	*Study Design: Prospective birth cohort  *Study Size: (pregnant): n=44 / (mother-infant pairs) n=26  *Study Population Age: >25 years  *Exposure (Median): 0.44 ng/mL /0.45 ng/mL	pregnant —— / pairs ——	pregnant —— / pairs ——		pregnant —— / pairs ——				
Lin et al., 2013	Individuals with abnormal urinalysis results from population-based screening program in Taiwan	*Study Design: Cross-sectional  *Study Size: n=551 (221 with elevated BP)  *Study Population Age: 12-30 years  *Exposure (Geo Mean): 1.01 ng/mL	a		1					
Lopez- Espinosa et al., 2012	Community- Based (C8 Health Project)	*Study Design: Cross-sectional  *Study Size: n=10,725  *Study Population Age: 1-17 years  *Exposure (Median): 1-4 to 1.8 ng/mL	a, b	↑ <sup>a,b</sup>				_	_	_
Mundt et al., 2007	Occupational, U.S. factory	*Study Design: Cross-sectional  *Study Size: n=592  *Study Population Age: not stated  *Exposure (Median: not available								

Table 6D. Summary of findings from epidemiologic studies of PFNA and thyroid hormones and related outcomes. Page 2 of 2

Wang et	Norway, Pregnant	*Study Design: Cross-sectional								
al., 2013	women from case-	*Study Size: n=903 (400 subfecund, 550								
,	control study	controls)	a					_		
	,	*Study Population Age: 18-44 years								
		*Exposure (Median): 0.51 ng/mL								
Wang et	Central Taiwan,	*Study Design: Cross-sectional / Prospective								
al., 2014a	pregnant woman	birth cohort	pregnant	pregnant	pregnant	pregnant				
	population and	*Study Size: (pregnant): n=285 / (neonate)	_/	↓ /	1/	/				
	neonates at birth	n=116	neonate	neonate	neonate	neonate				
		*Study Population Age: Mean age 28.8 years	_	↓		↓ ↓				
		*Exposure (Median): M-1.51 ng/mL								
Webster et	Canada, pregnant	*Study Design: Prospective birth cohort								
al., 2014	women in CHirP	*Study Size: n=152	<b> </b>							
	study	*Study Population Age: >18 years	-							
		*Exposure (Median): 0.60 ng/mL								
Wen et al.,	General U.S.	*Study Design: Cross-sectional								
2013	Population	*Study Size: n=1,180	a,b	ь	a,b	a,b	a,b		a,b	a,b
	(NHANES, 07-2010)	*Study Population Age: >20 year		_						<del></del>
		*Exposure (Geo Mean): 1.54 ng/mL								

 $<sup>\</sup>uparrow$  = statistically significant increased association,  $\downarrow$  = statistically significant decreased association,  $\uparrow$  - = inconsistent positively associated finding (findings from different models resulted in both statistically and non-statistically significant associations),  $\downarrow$  - = inconsistent negatively associated finding, — = not statistically significant, [statistical significant determined at  $\alpha$ =0.05]

TSH=thyroid stimulating hormone, TT4=total thyroxine, FT4=free thyroxine, TT3=total triiodothyronine, FT3= free triiodothyronine, TG=thyroglobulin, TD=thyroid disease, Hypo=hypothyroidism, Hyper=hyperthyroidism

<sup>&</sup>lt;sup>a</sup> Outcome log-transformed for use in linear regression; <sup>b</sup> Exposure log-transformed for use in linear regression

Table 6E. Summary of findings from epidemiologic studies of PFNA and reproductive outcomes. Page 1 of 2

Citation	Study Population	Study Details	Age @ M	Meno	Hyst	Eclp	Endo	SM	SDD	SQP
Buck et al.,	16 counties in	*Study Design: Cross-sectional								
2014	Michigan and	*Study Size: n=501								
	Texas, Male	*Study Population Age: Mean 31.8 years								b
	partners of couples	*Exposure (Median): Michigan (1.0), Texas								
	planning pregnancy	(1.65 ng/mL)								
Christensen	United Kingdom,	*Study Design: Nested case-control								
et al., 2011	girls recruited from	*Study Size: Cases n=218, controls n=230	ь							
•	mothers in a cohort	*Study Population Age: 8-13 years								
		*Exposure (Median): 0.6 ng/mL								
Leter et al.,	Greenland, Poland,	*Study Design: Cross-sectional								
2014	Ukraine, Male	*Study Size: n=262								
	partners of pregnant	*Study Population Age: > 18 years						b		
	women	*Exposure (Mean): Greenland (2.2 ng/ml),								
		Ukraine (1.1 ng/ml), Poland (1.4 ng/ml)								
Louis et al.,	Two U.S. cities,	*Study Design: Case-control								
2012	women in operative	*Study Size: OS: case n=190, controls n=283,								
	sample (OS) and	P: cases n=14, controls n=113					↑- <sup>b</sup>			
	population-based	*Study Population Age: >18-44 years								
	sample (P)	*Exposure (Geo Mean): 0.58-0.71 ng/mL								
Specht et	Greenland, Poland,	*Study Design: Cross-sectional								
al., 2012	Ukraine, fertile	*Study Size: n=604								
	male partners of	*Study Population Age: >18 years							b	
	pregnant women	*Exposure (Median): Greenland (1.4),								
		Ukraine (1.0), Poland (1.2)								
Starling et	Norway, pregnant	*Study Design: Nested case-control								
al., 2014	women recruit from	*Study Size: cases=466, controls n=510				ь				
•	cohort	*Study Population Age: 16-44 years								
		*Exposure (Median): 0.54 ng/mL								

Table 6E. Summary of findings from epidemiologic studies of PFNA and reproductive outcomes. Page 2 of 2

Taylor et al.	General U.S.	*Study Design: Cross-sectional						
2013	Population -	*Study Size: n=2,732						
	women	*Study Population Age: 20-65 years		↑	1			
	(NHANES, 99-	*Exposure (Median): pre-meno (0.90), meno						
	2000 & 03-2010)	(1.20), hyster (1.30 ng/mL)						
Toft et al.,	Greenland, Poland,	*Study Design: Cross-sectional						
2012	Ukraine, fertile	*Study Size: n=588						
	male partners of	*Study Population Age: > 18 years						b
	pregnant women	*Exposure (Medians): Greenland (1.7),						
		Ukraine (1.0), Poland (1.2 ng/mL)						

 $<sup>\</sup>uparrow$  = statistically significant increased association,  $\downarrow$  = statistically significant decreased association,  $\uparrow$  - = inconsistent positively associated finding (findings from different models resulted in both statistically and non-statistically significant associations),  $\downarrow$  - = inconsistent negatively associated finding, — = not statistically significant, [statistical significant determined at  $\alpha$ =0.05]

Age @ M=age at menarche, Meno=menopausal status, Hyst=hysterectomy, Eclp=preeclampsia, Endo=endometriosis, SM=sperm methylation. SDD= sperm DNA damage, SQP=semen quality parameters

<sup>&</sup>lt;sup>a</sup> Outcome log-transformed for use in linear regression; <sup>b</sup> Exposure log-transformed for use in linear regression

Table 6F. Summary of findings from epidemiologic studies of PFNA and neurobehavioral outcomes

Citation	Study Population	Study Details	ADHD	IRI	MI	AB
Braun et al., 2014	Cincinnati OH,	*Study Design: prospective birth cohort				
D14411 00 tal., 2011	mother-child pairs	*Study Size: n=175				
	Posses	*Study Population Age: pregnant women,				b
		children followed till age 5				
		*Exposure (Mean): 0.90 ng/mL				
Gallo et al., 2012	Community- Based	*Study Design: Cross-sectional				
,	(C8 Health Project)	*Study Size: n-21,024				
	<b>J</b>	*Study Population Age: > 50 years			b	
		*Exposure: $(40^{th} \text{ percentile}) = 1.0-1.2 \text{ ng/mL};$				
		(60 <sup>th</sup> percentile)=1.3-1.4 ng/mL				
Gump et al., 2011	Oswego County, NY -	*Study Design: Cross-sectional				
•	Subset of children	*Study Size: n=83		a, b		
	recruited from mailed	*Study Population Age: 9-11 years				
	invitation	*Exposure (Median): 0.82 ng/mL				
Hoffman et al., 2010	General U.S.	*Study Design: Cross-sectional				
	Population Children,	*Study Size: n=571				
	(NHANES, 99-2000	*Study Population Age: 12-15 years	_			
	& 03-2004)	*Exposure (Median): 0.6 ng/mL				
Ode et al., 2014	Sweden, children with	*Study Design: Matched case-control				
	ADHD and matched	*Study Size: cases n=206, controls n=206				
	controls selected from	*Study Population Age: children	_			
	study base	*Exposure (Mean): not provided				
Power et al., 2013	General U.S.	*Study Design: Cross-sectional				
	Population Children,	*Study Size: n=1,766			b	
	(NHANES, 99-2000	*Study Population Age: 60-85 years			_	
	& 03-2008)	*Exposure (Geo Mean): 1.01 ng/mL				

 $<sup>\</sup>uparrow$  = statistically significant increased association,  $\downarrow$  = statistically significant decreased association,  $\uparrow$  - = inconsistent positively associated finding (findings from different models resulted in both statistically and non-statistically significant associations),  $\downarrow$  - = inconsistent negatively associated finding, — = not statistically significant, [statistical significant determined at  $\alpha$ =0.05]

ADHD=attention deficient/Hyperactivity Disorder, IRI=impaired response inhibition, MI=memory impairment, AB=autistic behaviors <sup>a</sup> Outcome log-transformed for use in linear regression; <sup>b</sup> Exposure log-transformed for use in linear regression

Table 6G. Summary of findings from epidemiologic studies of PFNA and liver enzymes, bilirubin, and uric acid

Citation	Study Population	Study Details	ALT	GGT	AST	ALP	TB	UA
Gleason et	General U.S.	*Study Design: Cross-sectional						
al., 2015	Population Children,	*Study Size:	↑ a,b	↑- <sup>a,b</sup>	a,b	a,b	a,b	b
	(NHANES, 2007-	*Study Population Age: $\geq$ 12 years		-	—		_	
	2010)	*Exposure (Median): 1.4 ng/ml						
Lin et al.,	General U.S.	*Study Design: Cross-sectional						
2010	Population	*Study Size: n=2,216	ь	a,b			a,b	
	(NHANES, 99-00 &	*Study Population Age: ≥ 18 years		_				
	03-04)	*Exposure (Mean): 0.8ng/ml						
Lin et al.,	Individuals with	*Study Design: Cross-sectional						
2013	abnormal urinalysis	*Study Size: n=664 (246 with elevated						
	results from	BP)						
	population-based	*Study Population Age: 12-30 years						
	screening program in	*Exposure:						
	Taiwan	$(\leq 60^{\text{th}} \text{ percentile}) = 1.58 \text{ ng/mL};$						
		(> 90 <sup>th</sup> percentile)=6.78 ng/mL						
Mundt et	Occupational, U.S.	*Study Design: Cross-sectional						
al., 2007	factory	*Study Size: n=592						
		*Study Population Age: not stated						
		*Exposure (Median): not available						

 $<sup>\</sup>uparrow$  = statistically significant increased association,  $\downarrow$  = statistically significant decreased association,  $\uparrow$  - = inconsistent positively associated finding (findings from different models resulted in both statistically and non-statistically significant associations),  $\downarrow$  - = inconsistent negatively associated finding, — = not statistically significant, [statistical significant determined at  $\alpha$ =0.05] ALT=alanine aminotransferase, GGT=gamma-glutamyl transferase, AST=aspartate aminotransferase, ALP=alkaline phosphatase, TB=total bilirubin or unspecified bilirubin, UA=uric acid and outcome log-transformed for use in linear regression; Exposure log-transformed for use in linear regression

#### Serum Lipids

Associations of PFNA with serum lipids were evaluated in five cross-sectional studies from the general population (Fu et al., 2014; Lin et al., 2009; Lin et al., 2013; Nelson et al., 2010; Starling et al., 2014) and one occupational study which that included both cross sectional and retrospective cohort design components (Mundt et al., 2007). General populations studied included the general U.S. population (Lin et al., 2009; Nelson et al., 2010), a random selection of health clinic attendees in China (Fu et al., 2014), individuals with abnormal urinalysis results in Taiwan (Lin et al., 2013), and pregnant women in Norway (Starling et al., 2014). In these general population studies, median or geometric means for PFNA serum levels ranged from 0.37 ng/L to 1.19 ng/L; PFNA serum level data was not provided in the occupational study (Mundt et al., 2007). Parameters evaluated in one or more of these studies were total cholesterol, high density lipoprotein cholesterol (HDL), low density lipoprotein cholesterol (LDL), non-HDL, and triglycerides. Study details are provided in the tables for individual studies (Appendix 2) and the summary table for serum lipids above (Table 6A).

Three of four cross-sectional studies evaluating total cholesterol found evidence of a positive association with PFNA (Fu et al., 2014; Nelson et al., 2010; Mundt et al., 2007) while the fourth study, in pregnant women, found no significant association (Starling et al., 2014). In the two cross-sectional studies that reported positive associations and provided PFNA serum data, there was an increasing trend of serum PFNA with total cholesterol (Fu et al., 2014; Nelson et al., 2010). The occupational study additionally included a component employing a retrospective cohort design that evaluated men only but found no association with total cholesterol (Mundt et al., 2007).

The results of four studies evaluating high density lipoprotein cholesterol (HDL) and PFNA were inconsistent; one study found a negative association among adolescents but not among adults (Lin et al., 2009), one found a positive association in pregnant women (Starling et al., 2014) and two others found no association (Nelson et al., 2010; Mundt et al., 2007). HDL was the only lipid-related endpoint that was analyzed in both of studies of the general U.S. population, and both studies consistently found no association of PFNA and HDL among adults (Lin et al., 2009; Nelson et al., 2010).

Four of five studies evaluating low density lipoprotein cholesterol (LDL) and PFNA did not find associations (Lin et al., 2013; Nelson et al., 2010; Starling et al., 2014; and Mundt et al., 2007), while one study found a positive association (Fu et al., 2014). All five studies evaluating PFNA and triglycerides found no association (Fu et al., 2014; Lin et al., 2009; Lin et al., 2013; Starling et al., 2014; and Mundt et al., 2007).

Selection bias may be an issue in the Fu et al., 2014 since the study included only individuals attending a health clinic check-up such that individuals concerned with existing health issues may be more likely to be included. This may also be true in the Lin et al., 2013 study which included individuals with an abnormal urinalysis from a population-based screening program in which the final study population was made up of 246 (37%) individuals with elevated blood pressure. Information bias is unlikely to have an impact in the general population studies which relied on serum concentrations and clinical biomarkers. In contrast, Mundt et al. (2007) relied on

medical record abstraction of clinical parameters and work histories for exposure classification. Other limitations of Mundt et al. (2007) include small sample size that may limit power to detect associations, possibility of healthy worker effect, and the possibility that exposure in the least exposed groups may be well above the population exposure range in occupationally exposed individuals.

The epidemiologic data provide evidence of consistency, specificity, and exposure-response for PFNA and increased total cholesterol, although data on temporal relationship and strength of an association are limited. The possibility that PFNA causes increased cholesterol is further supported by evidence from epidemiology studies of PFOA, a closely related compound with similar toxicological effects. The epidemiology database for PFOA includes multiple studies of different designs in the general population, communities with drinking water exposure, and workers with occupational exposure, and suggests that a causal relationship may exist between PFOA and increased cholesterol (reviewed by Post et al., 2012; ECHA, 2014b).

The available epidemiological evidence does not support an association with PFNA and other serum lipid outcomes including HDL, LDL, and triglycerides.

Mode of action studies relevant to effects of PFNA on cholesterol and other lipid endpoints are discussed in the <u>Mode of Action</u> section (below).

#### Metabolic Parameters

Four cross-sectional studies (Lin et al., 2009; Lin et al., 2011; Lind et al., 2013; and Nelson et al., 2010) evaluated the association of PFNA with one or more metabolic parameters: glucose, insulin, the homeostasis model assessment of insulin resistance (HOMA), clinically diagnosed diabetes, and BMI. The study populations evaluated in these studies may not be comparable since these four studies differed in the ages, nationalities, and enrollment basis for their study populations; the ranges of serum PFNA levels; and the endpoints evaluated. Serum PFNA levels were similar in two studies of the general U.S. population (Lin et al., 2009; Nelson et al., 2010) and elderly individuals in the general Swedish population (Lind et al., 2013), and were relatively higher in a Taiwanese study participants with abnormal urinalysis results (Lin et al., 2013). Serum levels of maternal participants in a Danish prospective birth-cohort of mother-offspring pairs were several-fold lower than in the other studies (Halldorsson et al., 2012). The two cross-sectional studies of the general U.S. population cannot be compared because they did not evaluate any of the same endpoints (Lin et al., 2009 and Nelson et al., 2010). Study details are provided in the tables for individual studies (Appendix 2) and summary table for metabolic endpoints (Table 6B).

Statistically significant results in the four cross sectional studies included a negative association with insulin and PFNA among 12- 20 year olds (but not among those greater than 20 years of age) in the U.S. general population (Lin et al., 2009), and a positive association with diabetes and PFNA among the elderly in Sweden when the outcome was treated as a quadratic term, but not when treated linearly (Lind et al., 2013). The association of insulin with PFNA had a linear coefficient of small magnitude (Lin et al., 2009), and the association with diabetes had a small effect estimate with a wide confidence range (OR=1.25, 95% CI 1.08-1.44; Lind et al., 2013). As

summarized in Table 6B, no associations were found for insulin in two other cross-sectional studies, or for glucose in any of the three cross-sectional studies in which it was evaluated; diabetes was not assessed in any of the other studies.

Two studies evaluated the relationship of PFNA and BMI. A cross-sectional study of the U.S. general population found no evidence of an association with this endpoint (Nelson et al., 2010) and a Danish prospective birth cohort study, based on maternal PFNA serum levels for subjects evaluated in young adulthood, found an inconsistent positive association (Halldorsson et al., 2012). In this study, PFNA serum levels were several-fold lower than in the other studies of metabolic effects and fell within a narrow range, and PFNA was correlated with PFOA, which was found at much higher levels in serum. When PFOA was controlled for in an analysis of BMI and PFNA, the association became insignificant (Halldorsson et al., 2012).

Selection bias may be an issue in Lin et al. (2011) which included individuals with an abnormal urinalysis from a population-based screening program. Also losses due to follow-up in Halldorsson et al. (2012), a prospective birth cohort, may present bias. Information bias in unlikely to have an impact in these studies which relied mostly on serum concentrations and clinical biomarkers.

The small number of studies that evaluated concurrent exposure to PFNA and metabolic effects provide only limited evidence of associations of PFNA with these endpoints. The sole study that evaluated prenatal exposure suggested a potential association with PFNA and metabolic effects, but limitations in this study impact the ability to determine the independent impact of PFNA. The results of this study are not sufficient to develop conclusions about the potential for early life exposure to PFNA to cause these effects in adulthood.

Parameters related to glucose metabolism were affected by PFNA in mice (Fang, 2012C). These studies are discussed in the <u>Animal Toxicology</u> and <u>Mode of Action</u> sections below.

#### Immune System Outcomes

Information on the effects of PFNA on immune system outcomes in human observational studies comes from a case-control study (Dong et al., 2013), two prospective birth cohorts (Granum et al., 2013 and Wand et al., 2011) and a cross-sectional study (Humblet et al., 2014). Study details are provided in the tables of individual studies (Appendix 2) and summary table of immune system outcomes above (Table 6C).

Epidemiologic information on the effects of PFNA on human immune system outcomes is limited. Two studies evaluated PFNA and asthma among adolescents; a case-control study in Taiwan which found a positive significant association (Dong et al., 2013) and a larger cross-sectional study of the general U.S. population which found no association (Humblet et al., 2014). The Taiwanese case-control study additionally assessed immunological markers and found a positive association while a prospective birth cohort of children of pregnant women in Taiwan found no association with either immunological markers or atopic dermatitis (Wang et al., 2011). The results of these studies do not provide evidence of associations with PFNA and the outcomes

evaluated. Although some studies found significant associations, findings from additional studies were inconsistent.

A prospective birth cohort study in Norway found evidence of decreased response to rubella vaccine but not three other vaccines, inconsistent evidence of positive association with the common cold depending on which age period was evaluated, and no association with gastrointestinal illness (Granum et al., 2013). In this study, the association with decreased vaccine response was stronger for PFNA than for three other PFCs (PFOA, PFOS, and PFHxS); serum levels of PFOS and PFOA were 4 to 14 fold higher than PFNA. Other studies that have found associations with other PFCs and decreased vaccine response in children (Grandjean et al., 2012) and adults (Looker et al., 2013) did not evaluate PFNA. Information from the single study that evaluated PFNA is not sufficient to conclude whether or there is an association of PFNA and vaccine response.

Selection bias may influence estimates in Dong et al., 2013 case-control study. Losses due to follow-up may also influence findings in prospective birth cohorts (Granum et al., 2013; and Wang et al., 2011). Information bias may be present due to parental response to questionnaire-based outcome assessments.

PFNA and other biologically persistent PFCs, including PFOA and PFOS, cause immunotoxicity in animal toxicology studies (Lau et al., 2012). The studies which evaluated PFNA are discussed in the <u>Animal Toxicology</u> and <u>Mode of Action</u> sections below.

#### Thyroid hormones and other related outcomes

Studies of thyroid hormones and related outcomes including hypo- and hyperthyroidism and thyroid disease include seven general population cross-sectional studies (Bloom et al., 2010; Jain, 2013; Ji et al., 2012; Lin et al., 2013; Lopez-Espinosa et al., 2012; Wang et al., 2013; and Wen et al., 2013), two prospective birth cohort studies (Kim et al., 2011 and Webster et al., 2014), one study which presents findings from a cross-sectional and prospective birth cohort study designs (Wang et al., 2014a), and one occupational cross-sectional study (Mundt et al., 2007). These four studies differed in the age, nationality, and enrollment basis for their study populations; their ranges of serum PFNA levels; and the endpoints evaluated. Study details are provided in the tables of individual studies (Appendix 2) and the summary table for thyroid effects and other related outcomes (Table 6D).

All 11 studies evaluated associations with an increase of thyroid stimulating hormone (TSH). Only one study found limited evidence of a positive association with TSH (Webster et al., 2014) while the 10 other studies found no evidence of an association. Of the eight studies that evaluated total thyroxine (TT4), six found no association (Jain, 2013; Ji et al., 2012; Kim et al., 2011; Mundt et al., 2007; and Webster et al., 2014), one found a negative association (Wang et al., 2014a), and one found a positive association (Lopez-Espinosa et al., 2012). Five studies found no association with free thyroxine (FT4) (Bloom et al., 2010; Jain, 2013; Mundt et al., 2007; and Webster et al., 2014), one study found a positive association (Lin et al., 2013), and in a report which included two separate studies, no association was found among neonates in a prospective cohort study and a negative association was found in pregnant women in a cross-

sectional analysis (Wang et al., 2014a). Hypothyroidism was evaluated in three of the 11 studies, and additional endpoints (free triiodothyronine, thyroglobulin, hyperthyroidism, and unspecified thyroid disease) were each evaluated in only one study; no associations were found for any of these endpoints.

Selection bias may be an issue in Lin et al., 2013 study which included individuals with an abnormal urinalysis from a population-based screening program. Information bias is unlikely to have an impact in these studies which relied mostly on serum concentrations of exposure and outcomes. Although, serum thyroid measures are collected at a single time point in many studies, the measures are maintained over time. Also reliance on recall for studies assessing thyroid disease, hypo-, and hyperthyroidism may bias results (Lopez-Espinosa et al., 2012). Small sample sizes in some studies may have limited their power to detect associations (Bloom et al., 2010; Kim et al., 2011; Mundt et al., 2007; Webster et al., 2014).

In summary, the results of the available epidemiologic studies generally do not provide evidence of associations with PFNA and thyroid hormones. The limited evidence from epidemiological studies of PFNA and thyroid disease does not support associations with these endpoints.

An *in vitro* study that evaluated the effects of PFNA on thyroid-related endpoints (CITE) is discussed in the <u>Mode of Action section</u>, below.

#### Reproductive Outcomes

Although a variety of reproductive outcomes have been evaluated in epidemiology studies of PFNA, data for each of these outcomes is very limited. Only one epidemiology study evaluated each of the following endpoints: age at menarche (Christensen et al., 2011), menopausal status (Taylor et al., 2013), hysterectomy (Taylor et al., 2013), preeclampsia (Starling et al., 2014), endometriosis (Louis et al., 2012), sperm methylation (Leter et al., 2014), and sperm DNA damage (Specht et al., 2012). Semen quality parameters were the only outcome assessed in two studies (Buck et al., 2014; Toft et al., 2012). Study details are provided in the tables summarizing individual studies (Appendix 2) and summary table for reproductive outcomes (Table 6E).

There was a positive association for menopause and hysterectomy in a cross-sectional study of the U.S. population (Taylor et al., 2013) and minimal and inconsistent evidence of an association with endometriosis in a case-control study in two U.S. cities (Louis et al., 2012). As discussed in the Excretion subsection of the Toxicokinetics section (above), blood loss is an excretion route for PFNA and other PFCs. Because higher PFCs were associated with both natural menopause and hysterectomy, the authors conclude that the increased serum levels of PFNA with earlier menopause may be a result of reverse causality since menstruation is no longer an excretion pathway for PFNA.

Information bias is unlikely to have an impact in these studies which relied mostly on serum concentrations of exposure and outcomes.

As above, the range of serum levels in the general population studies assessing these reproductive endpoints is lower than exposure ranges which may result from exposure to

drinking water contaminated from PFNA, limiting ability to assess potential associations with reproductive outcomes occurring at higher exposures ranges of PFNA.

In summary, the database for PFNA and each individual reproductive effect is very limited. Except for a minimal and inconsistent association with endometriosis in one study and an association with menopause likely due to reverse causality in another study, no associations with PFNA were found for the reproductive endpoints that were evaluated.

Studies that evaluated reproductive effects of PFNA in animals are discussed in the <u>Animal Toxicology</u> section (below).

## Neurobehavioral Outcomes

Studies providing epidemiologic evidence of associations of PFNA with neurobehavioral outcomes include a cross-sectional study and a matched case-control study of attention deficit/hyperactivity disorder (ADHD) (Hoffman et al., 2010; Ode et al., 2014), a cross-sectional study of impaired response inhibition (Gump et al., 2011), two cross-sectional studies of memory impairment (Gallo et al., 2012; Power et al., 2013), and a prospective birth cohort study of autistic behaviors (Braun et al., 2014). Study details are provided in the tables for individual studies (Appendix 2) and summary table for neurobehavioral outcomes above (Table 6F).

Neither a matched case-control study in Sweden (Ode at el., 2014) nor a cross-sectional study in the U.S. general population (Hoffman et al., 2010) found evidence of an association with PFNA and ADHD. A cross-sectional study assessed impaired response inhibition and found a negative association with total PFC serum concentration and certain other PFCs but findings for the effect of PFNA alone were inconsistent (Gump et al., 2011). There is no further evidence of an association with memory impairment in two cross-sectional studies (Gallo et al., 2012 and Power et al., 2013), or autistic behaviors in a prospective birth cohort (Braun et al., 2014).

Information bias is possible in some studies due to self-reporting errors or parental report on outcome classification (Gallo et al., 2013; Hoffman et al., 2010; Power et al., 2013). Small sample sizes in some studies may limit the power of some studies to detect an association (Braun et al., 2014; Gump et al. 2011; Ode et al., 2014).

The limited epidemiologic evidence provides minimal evidence of associations of PFNA and neurobehavioral outcomes.

The potential for PFNA to cause neurobehavioral effects in animals has not been thoroughly evaluated, particularly as related to effects resulting from prenatal or early life exposures (see <u>Discussion of Uncertainties</u>, below).

### Birth Outcomes

Evidence describing the associations of PFNA with birth outcomes is available from three prospective birth cohort studies. A nested prospective birth cohort (Monroy et al., 2008) evaluated birth weight, gestational length, and birth gender. A prospective birth cohort study (Chen et al., 2012) assessed gestational age, birth weight, birth length, head circumference,

ponderal index, preterm birth, low birth weight, and small for gestational age and another prospective birth cohort study (Kim et al., 2011) evaluated birth weight. Serum PFNA concentrations varied over a 5-fold range among the study populations in the three studies, with geometric mean in cord blood of 2.36 ng/mL in Chen et al. (2012), and medians in cord blood of 0.94 ng/mL in Monroy et al. (2008) and 0.45 ng/ml in Kim et al. (2011). Additional study details are provided in the tables summarizing individual studies (Appendix 2).

The three studies which evaluated PFNA and birth outcomes did not find associations with birth weight. It is relevant to note that these three studies also did not find associations of PFOA and decreased birth weight, inconsistent with the general body of data on this issue, suggesting that their ability to detect associations with PFCs may have been limited. Two recent systematic reviews evaluated the numerous studies of associations of serum PFOA and fetal growth, as indicated by birth weight and other parameters (Johnson et al., 2014; Bach et al. 2015). Both reviews found that PFOA was associated with decreased average birth weight in most studies, and Johnson et al. (2014) concluded that the overall body of data from human studies is sufficient to conclude that decreased fetal growth is associated with PFOA exposure. The only study that evaluated birth length and decreased ponderal index found small but significant increases (Chen et al., 2012). Small sample sizes in these studies limited the ability to form conclusions on the impacts of PFNA and other PFCs.

PFNA causes adverse effects on developmental endpoints, including neonatal mortality and postnatal growth and development, in animals. These studies and data relevant to potential modes of action for these effects are discussed in the <u>Animal Toxicology</u> and <u>Mode of Action</u> sections, below.

#### Liver Enzymes and Bilirubin

Three cross-sectional epidemiologic studies evaluated the association of PFNA and liver enzymes and/or bilirubin. Lin et al. (2010) assessed the associations of PFNA in the general U.S. population with the liver enzymes, ALT and GGT, and total bilirubin and found a positive association only with total bilirubin. Gleason et al. (2015) assessed the same parameters as Lin et al. (2010) as well as the enzymes, AST and ALP, also in the U.S. general population, and found a positive association with PFNA and ALT and limited evidence of an association with GGT. Mundt et al. (2007) evaluated AST, ALT, bilirubin, GGT, and ALP and found evidence of a positive association with ALT among occupationally exposed study participants. Serum PFNA concentrations in the two studies of the U.S. general population differed (Lin et al., 2010: median=0.7 ng/ml; Gleason et al., 2015: median=1.4 ng/ml), while Mundt et al. (2007) did not provide information on serum concentrations. Additional study details are provided in the tables summarizing individual studies (Appendix 2) and summary table of findings (Table 6G).

These results provide limited evidence of an association with ALT and PFNA. Associations of the closely related compound, PFOA, and ALT were also found in the U.S. general population, communities with drinking water exposure, and occupationally exposed workers (reviewed in Post et al., 2012). The limited epidemiological information that is available did not find associations for PFNA and AST, bilirubin (total), GGT, or ALP.

Information bias is unlikely to have an impact in the general population studies which relied on serum concentrations and clinical biomarkers. In contrast, Mundt et al. (2007) relied on medical record abstraction of clinical parameters and work histories for exposure classification. Other limitations of Mundt et al. (2007) include small sample size that may limit power to detect associations, possibility of healthy worker effect, and the possibility that exposure in the least exposed groups may be well above the population exposure range in occupationally exposed individuals.

The hepatic toxicity of PFNA and other PFCs in animals is well established (Lau et al., 2012). Hepatic toxicity of PFNA in animals and potential modes of action for these effects are discussed in the <u>Animal Toxicity</u> and <u>Mode of Action</u> sections, below.

## Other outcomes

Cross-sectional studies evaluating associations of PFNA with several additional outcomes have been reported. Study details are provided in the tables for individual studies (Appendix 2).

#### Uric acid

Three studies evaluated PFNA and uric acid. There was evidence of a positive association of PFNA with a small increase in uric acid in a cross-sectional study of the U.S. general population (Gleason et al., 2015), but no such association was found in an occupational study (Mundt et al., 2007) or in a cross-sectional study of a Taiwanese study group with previously abnormal urinalysis results (Lin et al., 2013). Elevated levels of uric acid are associated with a variety of health outcomes, and increased uric acid has been associated with PFOA (Gleason et al., 2015).

# Estimated glomerular filtration rate (eGFR)

Watkins et al. (2013) found an association of PFNA and estimated glomerular filtration rate eGFR), a measure of kidney function, in a cross-sectional study of children from a community with elevated PFOA exposures from contaminated drinking water. This association likely results, at least in part, from reverse causality since PFNA is excreted by the kidney, so its elimination is slower when kidney function is impaired.

#### Carotid artery intima-media thickness

A cross-sectional study in a Taiwanese population with abnormal urinalysis results did not find an association with PFNA and carotid artery intima-media thickness (CIMT) a marker of subclinical atherosclerosis (Lin et al., 2013). Selection bias may be present in this study which included individuals with an abnormal urinalysis from a population-based screening program in and which the final study population was made up of 246 (37%) individuals with elevated blood pressure.

## LINE-1 DNA methylation LINE-1 DNA methylation

A cross-sectional study of U.S. adults from a community with elevated PFOA exposures from contaminated drinking water found no association of PFNA with % LINE-1 DNA methylation in leukocytes (Watkins et al., 2014). This endpoint has been linked to genomic instability, risk of cancer, cerebrovascular outcomes, and serum lipids.

#### Cancer

Epidemiologic evidence of PFNA and cancer is available from only one case-control study of prostate cancer (Hardell et al., 2014). This study found no association of PFNA and prostate cancer. Details are provided in the table for this study in Appendix 2.

As discussed in the <u>Animal Toxicology</u> and <u>Discussion of Uncertainty</u> sections (below), the carcinogenic potential of PFNA has not been evaluated in animals.

# Summary of epidemiological information

Of the endpoints evaluated in the studies reviewed above, the evidence for association with PFNA is strongest for serum cholesterol and ALT. These associations with PFNA are consistent with similar associations for these parameters in most, but not all studies, of PFOA and PFOS - two PFCs that have been more widely studied than PFNA. Causality cannot be proven for the associations that were reported since they primarily come from cross-sectional studies. Therefore, human data were not used as the basis for the quantitative risk assessment. Because human epidemiology data were not used as the primary basis for risk assessment, a formal weight of evidence evaluation of causality for the human studies was not conducted.

For many of the other endpoints that were evaluated, minimal or no evidence was found for associations with PFNA. For many of these endpoints, the epidemiological data are limited to one or very few studies and are not sufficient to make general conclusions about potential effects of PFNA. For other endpoints such as thyroid hormones, a larger number of studies are available. Some of the endpoints for which no associations were found for PFNA have been associated with other PFCs, including PFOA and PFOS (reviewed by Lau et al., 2012; Post et al., 2012; Gleason et al., 2015). Results of animal studies and mode of action studies for these PFCs suggest that they cause similar toxicological effects as PFNA. In evaluating the differing results for PFNA and other PFCs, a potentially important consideration is that serum levels of PFNA are lower than for PFOA and PFOS in the general population studies. Additionally, as discussed above, the range of serum PFNA levels in the general population studies is lower than those which would result from exposure to drinking water contaminated from PFOA. There is no information on the potential for PFNA to impact these health endpoints in communities with higher exposures from contaminated drinking water.

The health effects of prenatal and early life exposures to environmental contaminants in adulthood are a current focus of environmental health research (Heindel and Vandenberg, 2015). Only one epidemiology study in which PFNA serum levels were low and fell within a small range, investigated effects of prenatal exposure to PFNA on metabolic effects in early adulthood. Additional research is needed to evaluate the potential of developmental exposures to PFNA to impact health later in life.

# Animal Toxicology

#### Overview

Peer-reviewed toxicology studies of oral or inhalation exposure to PFNA include ten short term (14 day) oral studies, four oral reproductive/developmental studies, one oral subchronic study, all

conducted in rodents, and an acute inhalation study in rats (Kinney et al., 1989). Each of these studies, with the exception of two that assess only mode of action endpoints (Fang, 2012b, c), is summarized in a separate table in Appendix 3. Summary tables of information on those endpoints of toxicity for which there is sufficient information are included below (Tables 7A-F).

The 14 day studies include seven in male rats (Fang et al., 2009; 2010; 2012 a, b, c; Feng et al., 2009, 2010), two in male mice (Fang et al., 2008; Wang et al., 2014b) and one in both sexes of mice (Kennedy et al., 1987). These short term studies focused on specific endpoints of toxicity (e.g. liver, immune system, or testicular), and many of them include mechanistic components intended to elucidate the mode of action for the observed effects. The rat subchronic study (Mertens et al., 2010) used Surflon S-111, a mixture of PFCs consisting primarily of PFNA (see below).

The reproductive/developmental studies include a two-generation study in rats dosed with Surflon S-111 (Stump et al., 2008), and studies of gestational exposure to PFNA in CD-1 mice (Das et al., 2015), wild type and PPAR-alpha knockout mice (Wolf et al., 2010), and rats (Rogers et al., 2014).

Other PFNA toxicology studies include five rodent studies using dosing via intraperitoneal injection (Goecke-Flora and Reo, 1996; Kudo et al., 2000, 2001, 2003, 2006; Rockwell et al., 2013), and a 7 day mouse oral gavage study which is available as an abstract (Das et al., 2013). Additionally, results of an unpublished study of Surflon S-111 that included a higher dose than the published studies (Wolterbeek, 2004) are discussed by Stump et al. (2008) and Mertens et al. (2010). These studies add to the body of knowledge of effects of PFNA and are discussed in the text. However, they were not considered for use as the basis for the risk assessment because the route of administration is not relevant to environmental exposure or because they were not published in peer reviewed form. For this reason, they are not included in individual study tables (Appendix 3) or the summary tables (Table 7).

### Importance of serum PFNA data in interpretation of toxicology studies

Because the half-life of long-chain PFCs such as PFNA is much longer in humans (several years) than in rats and mice (days to weeks), a given administered dose (mg/kg/day) results in a much greater body burden (as indicated by serum level) in humans than in these animal species. Therefore, comparisons between effect levels in animal studies and human exposures are made on the basis of serum levels rather than administered dose.

Most of the PFNA toxicology studies do not provide serum PFNA data. PFNA serum levels were measured at the same time point as when endpoints of toxicity were assessed in two mouse studies, the developmental study of Das et al. (2015) and the 14 day study of Wang et al. (2014). In Das et al. (2015) presents the serum data graphically, and it was provided to the Health Effects Subcommittee in numerical form including statistical parameters by the investigators (C. Lau, personal communication). Wang et al. (2014b) provides numerical serum PFNA data but does not include statistical parameters for these data.

The only other toxicology studies in which serum PFNA data were reported are the

developmental toxicity study in wild type (WT) and PPAR-alpha knockout (KO) mice (Wolf et al., 2010) and the studies of the Surflon S-111 PFC mixture consisting primarily of PFNA (Stump et al., 2008; Mertens et al., 2010).

In Wolf et al. (2010), serum PFNA levels were measured 23 days after dosing ended. At this time point, a considerable portion of the PFNA had been excreted, with additional loss of PFNA through transfer to breast milk in the lactating dams. Since these serum levels were not taken at the end of the dosing period, they are not indicative of the maximum exposure levels which may have caused toxicity.

Mertens et al. (2010) present serum PFC levels over time in each dosed group in graphs but do not provide the numerical data that are needed for dose-response modeling. Additionally, the data for the lower serum levels cannot be accurately estimated from the graphs, due to their scale. Stump et al. (2008) provides only area under the curve graphs for serum levels of the Surflon S-111 mixture, and no serum data is presented for individual PFCs. Numerical serum PFNA data from these studies has been requested from the sponsors of these studies but has not been provided to date.

# Issues related to interpretation of Surflon S-111 studies

The oral subchronic rat study (Mertens et al., 2010) and two-generation oral rat study (Stump et al., 2008), used Surflon S-111 (CAS # 72968-38-8), a commercial mixture of linear perfluorinated carboxylic acids containing primarily PFNA. These two studies are important because they are the only available studies with dosing for more than 18 days.

#### Estimation of PFNA doses

The specific composition of the Surflon S-111 used in these studies is not reported; this information has been requested but not provided from the study sponsors to date. The composition of Surflon S-111 by weight was reported by Prevedouros et al. (2006) as PFNA, 74%; perfluoroundecanoic acid (C11), 20%; perfluorotridecanoic acid (C13), 5%; PFOA (C8), 0.78%; perfluorodecanoic acid (C10), 0.37%; and perfluorododecanoic acid (C12), 0.1%. This composition is assumed in the evaluation of the two studies.

In these two studies, the daily doses of PFNA in the Surflon S-111 were 0.025, 0.125, or 0.6 mg/kg/day. Based on the assumed percentages of PFCs in Surflon S-111 given above, the doses of PFNA are estimated as 0.019, 0.09, and 0.44 mg/kg/day. For perfluoroundecanoic acid (C11), the next most abundant PFC in the mixture, the doses are estimated as 0.005, 0.025, and 0.12 mg/kg/day, and the PFOA doses are estimated to be about 1% of the PFNA doses (about 0.0002, 0.0009, and 0.004 mg/kg/day).

Evaluation of the contribution of PFNA to toxicity of Surflon S-111 PFC mixture
An important issue in interpretation of the two Surflon S-111 studies is whether the toxic effects resulted primarily from PFNA, the major component of Surflon S-111, or from the other PFC(s) present at lower concentration in the Surflon S-111 mixture. Information on the relationship of toxicity to the relative serum levels of PFNA and the other PFCs in the Surflon S-111 mixture in these studies is key to the evaluation of this issue.

As discussed above, serum levels of PFOA, PFNA, C11, and C13 in males and females in each dose group over time were presented graphically by Mertens et al. (2010). However, it is not possible to accurately estimate the serum values at lower dose levels from the graphs due to their scale. The numerical serum data has been requested from the study sponsors but has not been provided to date.

Although the serum PFC data presented cannot be completely and precisely interpreted, several important general conclusions can be made from the serum PFC graphs and the toxicity results. These data suggest that the effects of Surflon S-111 in Mertens et al. (2010) are, at least primarily, due to PFNA, rather than C11 or the other PFCs present in even lower concentrations. Consistent with other pharmacokinetic studies in rats (discussed above), serum PFNA levels in male rats were much higher than in female rats given the same administered dose. In contrast, serum levels of C11 were similar, and generally somewhat higher, in females than in males at the same administered dose.

Effects common to both genders (including changes in clinical chemistry parameters, increased liver weight, and increased hepatic beta-oxidation) occurred at lower administered doses in males than females, and some effects (including liver histopathology) occurred in males but not in females.

The LOAELs and NOAELs for Surflon S-111 in Mertens et al. (2010) are: LOAELs: 0.125 mg/kg/day (males) and 0.6 mg/kg/day (females); NOAELs: 0.025 mg/kg/day (males) and 0.125 mg/kg/day (females) (Table 7 and Appendix 3). At these LOAELs, PFNA serum levels were similar in males and females, while C11 serum levels were about 10-fold higher in females than in males (at the end of the 90 day study). The PFNA serum levels at the NOAELS are also similar in males and females, based on very rough estimates from the graphs provided. If C11 were a major contributor to the toxicity of Surflon S-111, effects would be expected in 0.125 mg/kg/day females, and a greater response would be expected in 0.6 mg/kg/day females than in 0.125 mg/kg/day males. These data suggest that effects of Surflon S-111 are primarily due to PFNA, not C11, assuming that males and females are equally susceptible to the toxicity of these PFCs.

In agreement with these conclusions, Mundt et al. (2007) also attribute the greater toxicity of Surflon S-111 in male rats than female rats in the unpublished reports (WIL Research Laboratories, 2006) of the subchronic study (Mertens et al., 2010) to the higher serum PFNA levels in males as compared to female rats.

In the two-generation study (Stump et al., 2008), data on serum levels of PFNA and the other PFCs in the Surflon S-111 mixture are not presented. This information has been requested from the study sponsors but has not been provided to date. As was seen in Mertens et al. (2010), effects common to both genders (increased liver and kidney weight, hepatocellular hypertrophy, renal tubule cell hypertrophy) occurred at lower administered doses in males than in females, and other effects (decreased body weight, hepatocellular necrosis) occurred only in males.

Furthermore, a recent 7 week oral reproductive/developmental study of C11 in rats (Takahashi et al., 2014) supports the conclusion that C11 is not primarily responsible for the toxicity of the Surflon S-111 mixture. Takahashi et al. (2014) identified 0.1 mg/kg/day as the NOAEL and 0.3 mg/kg/day as the LOAEL for repeated dose toxicity of C11 in males and females, based on the occurrence of centrilobular hypertrophy of hepatocytes. For reproductive/developmental toxicity, the NOAEL and LOAEL for C11 were identified as 0.3 mg/kg/day and 1 mg/kg/day, respectively, based on decreased body weight at birth and decreased body weight gain at PND 4. As discussed above, the doses of C11 are estimated as 0.005, 0.025, and 0.12 mg/kg/day in the 0.025 mg/kg/day, 0.125 mg/kg/day and 0.6 mg/kg/day Surflon S-111 groups (respectively) in Mertens et al. (2010) and Stump et al. (2008).

Although serum levels of C11 were not measured by Takahashi et al. (2014), it is notable that the dose of C11 (0.025 mg/kg/day) at the LOAEL in males in Mertens et al. (2010) is about 10-fold lower than the LOAEL (0.3 mg/kg/day) for systemic toxicity identified by Takahashi et al. (2014). Similarly, the highest C11 dose in Stump et al. (2008), 0.12 mg/kg/day, was well below the NOAEL for reproductive/developmental toxicity of 0.3 mg/kg/day identified by Takahashi et al. (2014). These observations are even more significant because the duration of exposure in Stump et al. (2008) and Mertens et al. (2010) was several fold longer than in Takahashi et al. (2014).

Finally, C11 and C13 were less potent than PFNA as in vitro activators of PPAR-alpha, a nuclear receptor believed to be involved in many effects of PFCs (discussed in <u>Mode of Action</u> section, below).

Based on the information reviewed above, it is concluded that PFNA is likely the primary contributor to the toxicity of Surflon S-111 reported by Stump et al. (2008) and Mertens et al. (2010).

Table 7A. Summary of decreased body weight after oral administration of PFNA

		Administered Dose			NOAEL*	LOAEL*
Citation	Species/strain	(mg/kg/day)	Duration	Endpoint	(mg/kg/day)	(mg/kg/day)
Kennedy et al. (1987)	Crl:CD-1 mouse	0, 3, 10, 30, 300 ppm in diet. Estimated as 0, 0.45, 1.5, and 4.5 mg/kg/day	14 days	↑ relative liver weight	10 ppm (estimated at 1.5 mg/kg/day)  (Data not provided; text states weight loss and generalized weakness occurred at this dose).	30 ppm (estimated as 4.5 mg/kg/day) (100% mortality at higher doses)
Wang et al. (2014b)	Male Balb/C mouse	0, 0.1, 1, 5	14 days	↓ body weight	1	5
Fang et al. (2008)	Male Balb/C mouse	0, 1, 3, 5	14 days	↓ body weight	1	3
Fang et al. (2009)	Male Sprague- Dawley rat	0, 1, 3, 5	14 days	↓ body weight	1	3
Mertens et al. (2010)	Sprague-Dawley Rat	Surflon: 0, 0.025, 0.125, 0.6 PFNA: 0, 0.019, 0.09, 0.44.	90 days, followed by 60 day recovery	↓ body weight  (Not attributable to ↓ food	Males: Surflon: 0.125 PFNA: 0.09 Females: Surflon: 0.6 PFNA: 0.44	Surflon: 0.6 PFNA : 0.44
		Gavage	period.	consumption)	Males, 60 day recovery: Surflon: 0.125 PFNA: 0.09	Surflon: 0.6 PFNA: 0.44
Stump et al. (2008)	Sprague-Dawley Rat	Surflon: 0, 0.025, 0.125, 0.6	18-21 weeks	↓ body weight     (F0 and F1 males)	Surflon: 0.125 PFNA: 0.09	Surflon: 0.6 PFNA: 0.44
		PFNA: 0, 0.019, 0.09, 0.44. Gavage		(Not attributable to ↓ food consumption)	Females: Surflon: 0.6 PFNA: 0.44	
Das et al. (2015)	Pregnant CD-1 mouse	0, 1, 3, 5, 10	GD 1-17	Maternal weight gain	5	10 (substantial weight loss starting on GD 8; sacrificed on GD 13)

<sup>\*</sup> NOAELs are defined as the highest dose that did not produce a statistically significant (e.g., p<0.05) effect, and LOAELs are defined as the lowest doses with statistically significant (e.g., p<0.05) effects. For some endpoints, there were dose-related trends that included non-statistically significant changes at lower doses.

Table 7B. Summary of key endpoints for hepatic toxicity and carbohydrate/lipid metabolism after oral exposure to PFNA

Citation	Species/	Administered Dose			NOAEL*	LOAEL*
	strain	(mg/kg/day)	Duration	Endpoint	(mg/kg/day)	(mg/kg/day)
Kennedy	Crl:CD-1	0, 3, 10, 30, 300 ppm (diet).	14 days	↑ relative liver weight		3 ppm
et al. (1987)	mouse	Est 0, 0.45, 1.5, 4.5 mg/kg/day				(estimated as 0.45 mg/kg/day)
Stump et	Sprague	Surflon:	18-21	↑ liver weight	Males: Surflon: 0.025	Surflon: 0.125
al. (2008)	-	0, 0.025, 0.125, 0.6	wks.	(absolute and relative)	PFNA: 0.019	PFNA: 0.09
	Dawley				Females: Surflon: 0.125	Surflon: 0.6
	Rats	PFNA:			PFNA: 0.09	PFNA: 0.44
	(F0 and	0, 0.019, 0.09, 0.44.		Hepatocellular	Males:	Surflon: 0.025
	F1)			hypertrophy	30 00 00 00	PFNA: 0.019.
		Gavage		(LOAEL is lower than	Females:	Surflon: 0.6
				for ↑ liver wt.)		PFNA: 0.44 (Lower doses not evaluated)
				Hepatocellular	Males:	Surflon: 0.025
				necrosis		PFNA: 0.019
Mertens	Sprague	Surflon:	90 day	↑ liver weight	Males: Surflon: 0.025	Surflon: 0.125
et al.	-	0, 0.025, 0.125, 0.6	main	(absolute and relative)	PFNA: 0.019	PFNA: 0.09
(2010)	Dawley		study, 60	<u> </u>	Females: Surflon: 0.125	Surflon: 0.6
` /	Rats	PFNA:	day	↑ beta-oxidation in	PFNA: 0.09	PFNA: 0.44
		0, 0.019, 0.09, 0.44.	recovery	liver (marker of	Males, 8 weeks after dosing ended:	
			period.	peroxisome	Surflon: 0.125	Surflon: 0.6
		Gavage	1	proliferation).	PFNA: 0.09	PFNA: 0.44
		-		,	Females, 8 weeks post-dosing.	
					Surflon: 0.6	~~~~
					PFNA: 0.44	
				Hepatocellular	Males: Surflon: 0.025	Surflon: 0.125
				hypertrophy/	PFNA: 0.019	PFNA: 0.09
				eosinophilic foci	Females: Surflon: 0.6	
				•	PFNA: 0.44	
					Males, 8 weeks after dosing ended:	
					Surflon: 0.125	Surflon: 0.6
					PFNA: 0.09 (Females not evaluated)	PFNA: 0.44
				Necrosis	Males: Surflon: 0.125	Surflon: 0.6
					PFNA: 0.09	PFNA: 0.44
					Females: Surflon: 0.6	
					PFNA: 0.44	
					Males, 8 weeks after dosing ended:	
					Surflon: 0.125	Surflon: 0.6
					PFNA: 0.09 (Females not evaluated)	PFNA: 0.44
				Serum cholesterol	Surflon: 0.6	

<sup>\*</sup>NOAELs are defined as the highest dose that did not produce a statistically significant (e.g., p<0.05) effect, and LOAELs are defined as the lowest doses with statistically significant (e.g., p<0.05) effects. For some endpoints, there were dose-related trends that included non-statistically significant changes at lower doses.

Citation	Species/ strain	Administered Dose (mg/kg/day)	Duration	Endpoint	NOAEL* (mg/kg/day)	LOAEL* (mg/kg/day)
Das et al. (2015)	Pregnant and non-pregnant female CD-1 mice	0, 1, 3, 5	GD 1-16 or GD 1-17.	↑ liver weight (absolute and relative)  (End of dosing (GD 17) and PND 28 (4 weeks after dosing ended))  Histopathology not assessed. Fetus and pup liver weight data presented in Table 5F.		1
Wolf et al. (2010)	Female wild- type (WT) 129S1/SvlmJ mice and PPARα knockout (KO) mice on a 129S1/SvlmJ background; mated to males of same strain.	0, 0.83, 1.1, 1.5, 2	GD 1-18	↑ relative liver weight, 23 days after dosing ended (PND 21).  Histopathology not assessed.  Pup liver weight data presented in Table 5F.	Non-pregnant WT: Non-pregnant KO: 0.83 Pregnant WT: Pregnant KO: 2	0.83 1.1 0.83
Fang et al. (2012c).	Male Sprague- Dawley rats	0, 0.2, 1, 5	14 days Histopathology not assessed	↑ liver glycogen  ↑ serum glucose  ↑ serum LDL  ↓ serum HDL  ↓ serum HDL/LDL ratio	1 0.2 1  0.2	5 1 5 0.2
Wang et al. (2014b)	Male Balb/c mice	0, 0.2, 1, 5	14 days	↑ relative liver weight  ↑ liver lipids  ↓ serum lipids  ↑ serum liver enzymes	 1 1	0.2 0.2 5 5

<sup>\*</sup> NOAELs are defined as the highest dose that did not produce a statistically significant (e.g., p<0.05) effect, and LOAELs are defined as the lowest doses with statistically significant (e.g., p<0.05) effects. For some endpoints, there were dose-related trends that included non-statistically significant changes at lower doses.

Table 7C. Summary of key renal effects after oral administration of PFNA

Citation	Species/ strain	Administered Dose (mg/kg/day)	Duration	Endpoint	NOAEL* (mg/kg/day)	LOAEL* (mg/kg/day)
Mertens et al. (2010)	Sprague-	Surflon:	13 weeks	↑ kidney weight	Surflon: 0.6	
	Dawley	0, 0.025, 0.125, 0.6				
	Rat	PFNA:		Histopathological	PFNA: 0.44	
		0, 0.019, 0.09, 0.44.		changes in the		
		Gavage		kidney		
Stump et al. (2008)	Sprague-	Surflon:	18-21	↑ kidney weight	F0 and F1	
	Dawley	0, 0.025, 0.125, 0.6	weeks	(absolute and	males:	
	Rat	PFNA:		relative)	Surflon: 0.025	Surflon: 0.125
		0, 0.019, 0.09, 0.44.			PFNA: 0.019	PFNA: 0.09
		Gavage			F0 females:	
					Surflon: 0.125	Surflon: 0.6
					PFNA: 0.09	PFNA: 0.44
					F1 females:	
					Surflon: 0.6	
					PFNA: 0.44	
				Renal cell	F0 males:	
				hypertrophy	Surflon: 0.025	Surflon: 0.125
					PFNA: 0.019	PFNA: 0.09
					F1 males:	
					Surflon: 0.125	Surflon: 0.6
					PFNA: 0.09	PFNA: 0.44
					F0 females:	
					Surflon: 0.125	Surflon: 0.6
					PFNA: 0.09	PFNA: 0.44
					F1 females:	
					Surflon: 0.6	
1270 177					PFNA: 0.44	

<sup>\*</sup> NOAELs are defined as the highest dose that did not produce a statistically significant (e.g., p<0.05) effect, and LOAELs are defined as the lowest doses with statistically significant (e.g., p<0.05) effects. For some endpoints, there were dose-related trends that included non-statistically significant changes at lower doses.

Table 7D. Summary of key endpoints for immune system toxicity of PFNA after oral exposure

Citation	Species/	Administered Dose			NOAEL*	LOAEL*
	strain	(mg/kg/day)	Duration	Endpoint	(mg/kg/day)	(mg/kg/day)
Fang et al. (2008)	Male Balb/c	0, 1, 3, 5	14 days	↓ thymus weight (relative and absolute)	1	3
	mice			% immature versus mature T cells in	3	5
		Gavage		thymus		
				Impairment of cell cycle progression in	1	3
				thymus		
				↑ apoptosis in thymus	3	5
				↓ absolute spleen weight	1	3
					3	5
				↓ specific types of innate immune cells		1
				in spleen		
				Impairment of cell cycle progression in	And 100 100 And	1
				spleen		
				↑ apoptosis in spleen	3	5
				↓ cytokine (IL-4) secretion in spleen		1
				↑ serum cortisol	1	3
				↑ ACTH	3	5
Fang et al. (2009)	Male	0, 1, 3, 5	14 days	Thymus weight (absolute and relative)		1 (†)
	Sprague-					5 (1)
	Dawley rats	Gavage		Thymus histopathology	Stated to be dose	,
					not spe	ecified.
				Serum cytokine levels (↑ or ↓)	1	3
				↑ serum cortisol	3	5
Fang et al. (2010)	Male	0, 1, 3, 5	14 days	↓ absolute spleen weight	AN 100 UN AN	1
	Sprague-				3	5
	Dawley rats	Gavage		↑ apoptosis in spleen	1	3
Mertens et al	Sprague-	Surflon:	13 weeks;	Spleen and thymus weight	Surflon: 0.6	NA 100 307 AND NO. 100 AND
(2010);	Dawley	0, 0.025, 0.125, 0.6	18-21			Text reports tha
Stump et al.	Rats	PFNA:	weeks		PFNA: 0.44	there were no
(2008)	(male and	0, 0.019, 0.09, 0.44				effects; data noi
	female)					shown.
1270 177		Gavage				

<sup>\*</sup> NOAELs are defined as the highest dose that did not produce a statistically significant (e.g., p<0.05) effect, and LOAELs are defined as the lowest doses with statistically significant (e.g., p<0.05) effects. For some endpoints, there were dose-related trends that included non-statistically significant changes at lower doses.

Table 7E. Summary of key endpoints for male reproductive system toxicity of PFNA after oral exposure

Citation	Species/ strain	Administered Dose (mg/kg/day)	Duration	Endpoint	NOAEL* (mg/kg/day)	LOAEL* (mg/kg/day)
Feng et al. (2009)	Male Sprague- Dawley rats	0, 1, 3, 5 Gavage	14 days	Testicular histopathology  ↑ apoptosis in testes (TUNEL assay)	3	5 3 (Text states sharp ↑at 3 mg/kg/day: NOAEL not stated)
				↑ Serum testosterone		1 No effect at 3 mg/kg/day. Greatly ↓ at 5 mg/kg/day.
				↑ Serum estrogen	3	5
				% apoptotic testicular cells	1	3
				↑ testicular caspase-8 (part of death receptor pathway)	1	3
Feng et al. (2010)	Male Sprague- Dawley	0, 1, 3, 5 Gavage	14 days	Histopathology in seminiferous tubule.	(Not evaluated at 1)	3
	rats			↑ testicular Wilms tumor protein	*****	1
				testicular transferrin (delivers iron needed for sperm production)		1
				↑ testicular Mullerian inhibiting substance	3	5
				↓ testicular inhibin B (marker of testicular toxicity)	and the later and	1
Stump et al. (2008)	Male Sprague-	Surflon: 0, 0.025, 0.125,	18-21 weeks	↓ sperm motility (F1),     epididymis weight (F0, F1),	Surflon: 0.125	Surflon: 0.6
	Dawley rats	0.6 PFNA (est.): 0, 0.019, 0.09, 0.44		and epididymis sperm concentration (F0)	PFNA: 0.09	PFNA: 0.44
*NO 4 E1		Gavage				

<sup>\*</sup> NOAELs are defined as the highest dose that did not produce a statistically significant (e.g., p<0.05) effect, and LOAELs are defined as the lowest doses with statistically significant (e.g., p<0.05) effects. For some endpoints, there were dose-related trends that included non-statistically significant changes at lower doses.

Table 7F. Summary of key endpoints for reproductive/developmental effects of PFNA after oral exposure

Citation	Species/ strain	Administered Dose (mg/kg/day)	Duration	Endpoint	NOAEL* (mg/kg/day)	LOAEL* (mg/kg/day)
Stump et al. (2008)	Male Sprague-	Surflon: 0, 0.025,	F0 and F1: Starting at 6 weeks for at	↓ Fertility index in F0 males and females		Surflon: 0.025
See Table 7E for spermatogenic	Dawley rats	0.125, 0.6	least 70 days prior to mating,			PFNA (estimated): 0.019
endpoints.		PFNA:	throughout mating,			(No effect at higher doses)
		0, 0.019, 0.09, 0.44.	gestation, and lactation.	↑ relative liver weight in pups (PND 21)	F1: Surflon: 0.025 PFNA: 0.019	Surflon: 0.125 PFNA: 0.09
		Gavage			F2: Surflon: 0.125 PFNA: 0.09	Surflon: 0.6 PFNA: 0.44
				Maternal body weight gain; Pregnancy rate; Number of live pups at birth; Post-natal mortality; Pup body weight; Post-natal development	Surflon: 0.6 PFNA: 0.44	
Rogers et al. (2014)	Sprague- Dawley	0, 5	GD 1-20	↓ Maternal body weight gain		5
	Rats			↓ pup weight at birth		5
				Pup weight on PND 21 until age 56 weeks.	5	
				↑ systolic blood pressure in pups on PND 10.		5 (No effect on PND 26 and PND 56)
				↓ nephron endowment in renal glomeruli in PND 22	Males:	5 (Not associated with body wt. or kidney wt. changes)
					Females: 5	UNI AN AN AN AN AN

Citation	Species/ STRAIN	Administered Dose (mg/kg/day)	Duration	Endpoint	NOAEL* (mg/kg/day)	LOAEL* (mg/kg/day)
Das et al.	. CD-1 mice $0, 1, 3, 5, 10$		GD 1-16	Maternal weight loss; full litter resorptions	5	10
(2015)		(sacrifice d at term)	↑ fetal liver weight (Consistent with NOAEL/LOAEL for adult ↑ liver weight)		1	
			GD 1-17 (allowed to give	Post-natal mortality (Sharp ↑ starting on PND 2 through PND 10.)	3	5 (Severe effects at this dose)
		birth)	Pup body weight (Persisted in males until 9 months of age)	1	3	
			Post-natal development (Day of eye opening, vaginal opening, and preputial separation)		3	
			↑ pup liver weight	PND 1, 10, 24: (Consistent with NOAEL/LOAEL for adult ↑ liver weight in same study)	1	
					PND 42: 1	3
Wolf et	Female wild-	0, 0.83, 1.1,	CD 1 10	L programa v rata	PND 70: 5 WT: 2	20 50 50 50
al. (2010)	type (WT)	1.5, 2	1, GD 1-18	↓ pregnancy rate	KO:	0.83
	129S1/SvlmJ mice and			↓ number of live pups at birth	WT: 0.83 KO: 2	1.1
	PPARα knockout			↑ post-natal mortality	WT: 0.83 KO: 2	1.1
	(KO) mice on					
	a 129S1/SvlmJ		↓ pup weight gain	WT: 1.5 KO: 2	2	
background;			Delayed eye opening	WT: 1.5 KO: 2	2	
	males of			↑ pup liver weight	WT:	0.83
	same strain.			(PND 21; 23 days after last dose)	KO: 1.5 (Below NOAEL for ↑ maternal liver weight)	2

<sup>\*</sup>NOAEL is defined as the highest dose that did not produce a statistically significant (e.g., p < 0.05) effect. LOAEL is defined as the lowest dose with statistically significant (e.g., p < 0.05) effects. For some endpoints, there were dose-related trends that included non-statistically significant changes at lower doses.

#### Acute toxicity

No studies which determined the acute oral LD<sub>50</sub> of pure PFNA were located. No studies which determined the acute oral LD<sub>50</sub> of pure PFNA were located. However, Mertens et al. (2010) state that the "approximate lethal dose" (unpublished data, calculated herein as 65 mg/kg) in rats for the Surflon S-111 mixture of PFCs consisting primarily of PFNA (see below) was 2.9-fold lower than the acute LD50 for PFOA of 198 mg/kg identified by Olson and Anderson (1983).

The inhalation  $LC_{50}$  in male rats (5 or 6 per group) exposed for 4 hours to six concentrations ranging from 67 to 4600 mg/m<sup>3</sup> of ammonium perfluorononanoate (the ammonium salt of PFNA) as a dust was 820 mg/m<sup>3</sup>; the lowest dose that caused death was 590 mg/m<sup>3</sup>. Animals were observed for 5-14 days after exposure and deaths occurred earlier with increasing dose (Kinney et al., 1989). As has been observed in animals acutely exposed to PFOA, severe body weight loss occurred in surviving rats of all but the lowest dose group (reviewed in Lau et al., 2007; Post et al., 2012).

### Mortality

Mortality occurred in mice at doses of 10 mg/kg/day or higher in two 14 day mouse studies. In a 14 day dietary CD-1 mouse study of PFNA (Kennedy, 1987), all animals in the 300 and 3000 ppm groups died. The doses at these dietary concentrations are estimated as 45 and 450 mg/kg/day. The next lowest dose group, 30 ppm (estimated as 4.5 mg/kg/day) caused weight loss and generalized weakness. Consistent with these results, mortality occurred in 50% of male Balb/C mice dosed with 10 mg/kg/day PFNA for 14 days (Fang et al., 2008).

# **Body** weight

Effects of PFNA on body weight in mice and rats are summarized in Table 7A. In the rat studies, the decreased body weight was not attributable to decreased food consumption, while food consumption was not evaluated in the mouse studies.

Weight loss occurred in mice exposed to PFNA at >3 mg/kg/day for 14 days (Kennedy et al., 1987; Wang et al., 2014b; Fang et al., 2008; Fang et al., 2009). In an unpublished study of longer term exposure to Surflon S-111 in rats discussed in Stump et al. (2008), all males dosed with 2 mg/kg/day for 23 days were euthanized on day 23 due to severe clinical findings (no details provided) and severe body weight loss (Wolterbeek, 2004).

Decreased body weight gain also occurred in male (but not female) rats with longer exposures to 0.6 mg/kg/day Surflon S-111/0.44 mg/kg/day PFNA (Mertens et al., 2010; Stump et al., 2008). Body weight in rats exposed to this dose remained decreased 60 days after subchronic (90 day) exposure ended (Mertens et al., 2010).

# Hepatic Toxicity

Toxicology data on hepatic effects of PFNA are summarized in Table 7B.

#### Liver enlargement

Liver enlargement is a well-established effect of PFCs including PFNA (Lau, 2012). PFNA has been evaluated for increased liver weight only in rodents (Table 7B), while PFOA is known to cause this effect in non-human primates as well as rodents (reviewed in Post et al., 2012). As discussed in detail in the Mode of Action section (below), the increased liver weight caused by PFNA in rodents has both PPAR-alpha dependent and PPAR-alpha independent components

(Wolf et al., 2010:; Rosen et al., 2010). Hepatic beta-oxidation, a marker of PPAR-alpha activation, was significantly increased in male and female rats at the same PFNA doses at which liver weight was increased (Mertens et al., 2010).

The magnitude of increased liver weight was similar in male and female mice given the same dose (Kennedy, 1987). Since the half-lives of PFNA in male and female mice are similar (see above), these results suggest that male and female mice are equally susceptible to the liver weight increases induced by PFNA.

Statistically significant increases in liver weight occurred at doses as low as 0.2 mg/kg/day in mice in a 14 day study (Wang et al., 2014b) and 0.09 mg/kg/day (0.125 mg/kg/day Surflon S-111) in rats after 13 week exposure (Mertens et al., 2010). Increased liver weight also occurred in fetuses after *in utero* exposure and in pups exposed prenatally and through breast milk (Das et al., 2015; Wolf et al., 2010, discussed in Reproductive/Developmental Toxicity, below).

Increased liver weight persists after dosing with PFNA has ended. In male rats dosed for 90 days, increased liver weight persisted at 0.44 mg/kg/day PFNA/0.6 mg/kg/day Surflon S-111 for at least 60 days (about two half-lives for PFNA; Mertens et al., 2010). In CD-1 mice exposed during pregnancy, dose-related increases in absolute and relative liver weight persisted at 3 and 5 mg/kg/day on PND 28, 4 weeks after the last dose (Das et al., 2015). Absolute and relative liver weights were also increased on PND 21, 23 days after the last dose, in both WT and PPAR-alpha KO mice gestationally exposed to lower doses of PFOA than those used in the CD-1 mouse study (Wolf et al., 2010). Relative liver weights were increased at all doses (0.83 to 2 mg/kg/day) in non-pregnant WT and PPAR-alpha KO females, with significance in all groups except the lowest dose (0.83 mg/kg/day) PPAR- alpha KO. In mice that had given birth, relative liver weight was significantly increased at all doses in WT, but was not increased in PPAPR-alpha KO at any dose. In interpreting these results, it is important to note that in mice that had given birth, PFNA serum levels in the KO mice were much lower than in the WT mice for reason(s) that were not determined. The NOAELs and LOAELs for increased liver weight are consistent in the WT and KO mice on a serum level basis, suggesting that the differences in response is likely due to kinetic differences unrelated to PPAR-alpha status.

## Serum levels of liver enzymes

Increased serum liver enzymes AST and ALT, an indication of hepatic toxicity, were observed in male mice exposed to 5 mg/kg/day PFNA for 14 days (Wang et al., 2014b). In contrast, these two liver enzymes and GGT were not affected in the 90 day rat study of Surflon S-111 which used lower doses of PFNA (up to 0.44 mg/kg/day; Mertens et al., 2010).

#### Histopathology

Quantitative liver histopathology data (frequency and severity) were reported only for the 90 day subchronic and two-generation studies of Surflon S-111 (Mertens et al., 2010; Stump et al., 2008). Microscopic evaluation of the liver was not performed in other shorter term studies which generally used higher doses, with the exception of the 14 day rate study conducted by Fang et al., (2012a). Fang et al. (2012a) did not perform a systematic quantitative evaluation for this endpoint and provide only a brief summary of their observations using different terminology to describe the histopathological changes than that used in the Surflon S-111 rat

studies.

In both the 13 week and two-generation (18-21 week) rat studies, there were dose-related increases in frequency and severity of histopathological changes in liver (Mertens et al., 2010; Stump et al., 2008). These effects occurred at lower doses in the 18-21 week study (0.019 mg/kg/day PFNA/0.025 mg/kg/day Surflon) than in the 13 week study (0.09 mg/kg/day PFNA/0.125 mg/kg/day Surflon), and a NOAEL was not identified in the longer 18-21 week study. These results suggest that these effects occur at lower doses when exposure duration is increased from 13 weeks to 18-21 weeks.

Histopathological changes in the liver, including necrosis, occurred in males in the two-generation rat study (Stump et al., 2008) at a dose (Surflon S-111, 0.025 mg/kg/day; PFNA, 0.019 mg/kg/day) below the doses that caused increased liver weight in the same study. Thus, histopathological changes, including necrosis, were a more sensitive endpoint than increased liver weight in this study. It is important to note that some of the histopathological changes in the liver reported by Fang et al. (2012a), Stump et al. (2008), and Mertens et al. (2010) are types that are not typically associated with PPAR-alpha activation (peroxisome proliferation and increased smooth endoplasmic reticulum), suggesting that PFNA caused liver toxicity that was independent of PPAR-alpha in these studies.

Hepatocellular hypertrophy occurred at high frequency in both the 13 week study and the 18-21 week study (Mertens et al., 2010; Stump et al., 2008). In the 13 week study, the incidence in male rats was 60% at 0.09 mg/kg/day PFNA (0.125 mg/kg/day Surflon S-11), and 100% at 0.44 mg/kg/day PFNA (0.6 mg/kg/day Surflon S-111) both at the end of dosing and 60 days after exposure ended. In the longer duration (18-21 week) study, hepatocellular hypertrophy in F<sub>0</sub> and F<sub>1</sub> males occurred at lower doses and higher incidence than in the subchronic (13 week) study (77% at 0.019 mg/kg/day PFNA/0.025 g/kg/day Surflon S-111, and 100% at the two higher doses, 0.09 and 0.4 mg/kg/day PFNA (0.125 and 0.6 mg/kg/day Surflon S-111). This effect was not seen in females in the subchronic study, but occurred in F<sub>0</sub> females in the longer two–generation study. Hepatocellular hypertrophy was also evident in the photomicrographs of livers from rats treated with PFNA presented by Fang et al. (2012), although the authors did not use this term to describe their findings (K. Cooper, personal communication).

Hepatocellular necrosis occurred only in high dose males in the 13 week study, but was found in all dose groups, with dose-related increases in frequency and severity, in both the F0 and F1 males after longer (18-21 week) exposure (Mertens et al., 2010; Stump et al., 2008). Other histological changes including inflammation, clear cell foci, and vacuolation, were also seen in all dosed groups of  $F_0$  and  $F_1$  males in the two-generation study, with severity and/or incidence increasing with dose.

Hepatic and serum glucose/glycogen and lipids Summaries of key findings are shown in Table 7B.

Lau (2012) reported that PFOA causes hepatic lipid accumulation and decreased serum lipids in rodents, and similar effects have been observed in rodents treated with PFNA. In male mice exposed to PFNA for 14 days, hepatic triglycerides and total cholesterol were increased at 0.2

and 1 mg/kg/day, but not at a higher dose, 5 mg/kg/day. In serum, triglycerides and total cholesterol were decreased at 5 mg/kg/day but not at lower doses (Wang et al., 2014b). Serum cholesterol was also decreased in all groups of male rats treated with ≥ 0.1 mg/kg/day Surflon S-111 for 14 days in an unpublished study (Wolterbeek et al., 2004) cited by Mertens et al. (2010). In a study presented in poster/abstract form, hepatic triglyceride levels and lipid accumulation were increased in both SV129 wild type (WT) and PPAR-alpha null (knockout, KO) mice given 10 mg/kg/day PFNA for 7 days (Das et al., 2013). In male rats, there was lipid accumulation in livers at 5 mg/kg/day, but not lower doses (Fang et al., 2012a). Potential modes of action for these effects is discussed in the Mode of Action section (below). In contrast, total serum cholesterol was not affected in the 90 day study of Surflon S-111 in rats exposed to lower doses of PFNA (up to 0.44 mg/kg/day) and serum triglycerides were not measured (Mertens et al., 2010).

PFNA caused a dose-related increase in serum glucose, as well as a dose-related decrease in both serum HDL and a decrease in the serum HDL/LDL ratio in male rats dosed with 0.2-5 mg/kg/day PFNA for 14 days (Fang et al., 2012c). The authors note that a decreased serum HDL/LDL ratio often accompanies hyperglycemia. Liver glycogen content was increased in a dose-related manner, and the increase was significant at 5 mg/kg/day. In contrast, no effect on serum glucose was reported in the longer duration (subchronic) rat study at up to 0.44 mg/kg/day PFNA (Mertens et al., 2010).

# Renal Effects:

Kidney weight and histopathology were evaluated in the 13 week and two-generation (18-21 week) studies of Surflon S-111 in rats (Mertens et al., 2010; Stump et al., 2008). In these studies, renal effects occurred after 18-21 weeks of exposure, but not after 13 weeks of exposure to the same doses. These results suggest that a longer exposure duration is needed to produce renal effects. Renal endpoints were also evaluated in newborn rats exposed during gestation (Rogers et al., 2014; see <u>Reproductive/Developmental</u> section) (Table 7C).

In the two-generation study with 18-21 week exposure (Stump et al., 2008), dose-related increases in kidney weight occurred in  $F_0$  and  $F_1$  males, and  $F_0$  females. Dose-related increases in renal tubule cell hypertrophy were also found in  $F_0$  and  $F_1$  males in this study. This effect occurred in in 93-100% of high dose (0.6 mg/kg/day Surflon S-111/0.44 mg/kg/day PFNA)  $F_0$  and  $F_1$  males and at lower frequency in mid-dose (0.125 mg/kg/day Surflon S-111/0.09 mg/kg/day PFNA)  $F_0$  males, but not in control or low-dose (0.025 mg/kg/day Surflon S-111/0.019 mg/kg/day PFNA) males, and severity increased with dose in the  $F_0$  males. Other histopathological effects (renal inflammation, brown pigment, and capsular fibrosis) also occurred in a few treated  $F_0$  males. Renal tubule cell hypertrophy was also observed in 27% of high dose  $F_0$  females.

In contrast, there were no effects on kidney weight or renal histopathology in the subchronic (13 week) study. This study used the same doses as the two-generation (18-21 week) study (Mertens et al., 2010).

# Immune system effects

Toxicity to the immune system occurred in three 14 day oral gavage studies using PFNA doses of 1, 3, and 5 mg/kg/day (one in male mice, Fang et al., 2008; and two in male rats, Fang et al., 2009; Fang et al., 2010); Table 7D). Rockwell et al. (2013) also reported immune system toxicity

in male and female mice 14 days after a single high intraperitoneal (i.p.) dose of PFNA (0.1 mM/kg, calculated as 46.4 mg/kg). The longer duration rat studies (Mertens et al., 2010; Stump et al., 2008) found no effects on thymus and spleen weight at up to 0.44 mg/kg/day PFNA, but did not evaluate other parameters of immune function (Table 7D).

PFNA caused dose-related decreases in spleen and/or thymus weights (absolute and relative) in all three 14 day studies. Apoptosis was increased in a dose-related manner in spleens of mice and rats, and in thymus of mice (not evaluated in rats; Fang et al., 2008, 2010). Serum levels of hormones that suppress the immune system (cortisol in mice and rats; ACTH in rats) were increased by PFNA, and serum levels of cytokines involved with immune system function were affected by PFNA in both species (Fang et al., 2008, 2009). The most sensitive endpoints for immune system toxicity in mice were impairment of cell cycle progression, decreases in specific types of innate immune cells, and decreased interleukin-4 secretion in the spleen (Fang et al., 2008). These three splenic effects occurred at 1 mg/kg/day, and a NOAEL was not identified. In the rat, the most sensitive endpoints were decreased absolute and relative thymus weight and decreased absolute spleen weight. The LOAEL for these effects was also 1 mg/kg/day with no NOAEL identified (Fang et al., 2009; Fang et al., 2010). Other components of these studies related to the modes of action for these effects are discussed in the Mode of Action section (below).

In male and female C57Bl/6 mice 14 days after a single i.p. dose of 46.4 mg/kg PFNA, the number of red blood cells and leukocytes in the spleen was reduced by 87.5-95% and thymocyte viablility was decreased significantly. Additionally, other parameters of immune function in the spleen and thymus were affected. This dose caused substantial body weight loss (31% in males, 38% in females), an approximate 3-fold increase in liver weight/body weight ratio, and a 60-70% decrease in spleen weight/body weight ratio (Rockwell et al., 2013).

## Male reproductive system effects

Three studies in rats found effects of PFNA on the male reproductive system at doses  $\leq 1$  mg/kg/day. PFNA caused toxicity to the male reproductive system in two 14 day oral gavage studies using dose levels of 1, 3, and 5 mg/kg/day (Feng et al., 2009; Feng et al., 2010). Some endpoints related to the male reproductive system were also affected in the two-generation study of Surflon S-111 (Table 7E). Sensitive endpoints include histopathological changes in the seminiferous tubules, increased serum testosterone, changes in Sertoli cell secretions, reduced sperm motility, and decreased epididymis weight and sperm concentration.

PFNA caused dose-related disruption of spermatogenesis and increases in apoptosis in testicular cells of male rats (Feng et al., 2009). Hormones related to reproductive function were also affected. Serum estradiol increased at 5 mg/kg/day, while testosterone was increased at 1 mg/kg/day and decreased at 5 mg/kg/day. These hormones are also affected by other PFCs. Testosterone was decreased in rats treated with perfluorodecanoic acid (C10; Bookstaff et al., 1990) and perfluorododecanoic acid (C12; Shi et al., 2009), and estradiol was increased in male rates exposed to PFOA for 1-12 months in a two year dietary study (Biegel et al., 2001).

PFNA also caused ultrastructural changes and effects on multiple functions of Sertoli cells, testicular cells that play a key role in spermatogenesis (Feng et al., 2010). Levels of four

proteins secreted by Sertoli cells in testes or serum were affected by 1 mg/kg/day PFNA, with no NOAEL identified. These include increases in Mullerian inhibiting substance and Wilms tumor protein, both involved with regulation of testosterone production and spermatogenesis, and decreases in transferrin, which delivers iron needed for sperm production, and inhibin B, a glycoprotein that modulates FSH secretion that is considered to be a marker of testicular toxicity in rodents.

Effects on the male reproductive system were also reported in rats after 18-21 weeks of exposure to Surflon S-111 in the two-generation study (Stump et al., 2008). Sperm motility and progressive motility were significantly decreased in high dose (0.44 mg/kg/day PFNA/0.6 mg/kg/day Surflon S-111)  $F_1$  males. Although it is stated that this effect is not test related because reproductive organ weights were not affected, the data tables show significantly decreased left epididymis weight at 0.6 mg/kg/day Surflon S-111 (0.44 mg/kg/day PFNA) in  $F_0$  and  $F_1$  males and significantly decreased left epididymis sperm concentration at this dose in  $F_0$  males.

## Reproductive/developmental effects

Four studies of reproductive and developmental effects of PFNA have been conducted (Table 7F).

A study of CD-1 mice with gestational exposure to PFNA (1-10 mg/kg/day) evaluated reproductive outcomes, fetal abnormalities, and postnatal development (Das et al, 2014; previously reported as Lau et al., 2009). Since PPAR-alpha is known to mediate some of the developmental effects of the related compound PFOA, a second study in wild type (WT) and PPAR-alpha null ("knockout", KO) strains of mice was undertaken to elucidate the role of PPAR-alpha in developmental toxicity of PFNA (0.83 to 2 mg/kg/day; Wolfe et al., 2010). The designs of these two mouse studies were similar to the analogous studies of PFOA at higher doses in CD-1 mice (1-40 mg/kg/day) and WT and KO mice (0.1-20 mg/kg/day) from the same laboratory (Lau et al., 2006: Abbott et al., 2007). A two-generation study of Surflon S-111 (0.019-0.44 mg/kg/day PFNA) assessed reproductive parameters and postnatal development in rats (Stump et al., 2008). Finally, a study using only one dose level of PFNA (5 mg/kg/day) in rats exposed on GD 1-20 focused on endpoints related to elevated blood pressure in offspring (blood pressure, nephron endowment, renal glucocorticoid receptor mRNA level; Rogers et al., 2014).

As discussed below, several developmental endpoints affected by PFNA in mice were not impacted by PFNA in rats (Stump et al., 2008; Wolf et al., 2010; Das et al., 2015). As is the case for PFOA, PFNA is excreted much more quickly in female rats than in female mice or male rats (see <u>Toxicokinetics</u>, above). Thus, the rat may not be the most appropriate model for evaluation of developmental effects of PFNA because the developing rat fetus receives a much lower dose than the developing mouse fetus at the same maternally administered dose.

## PFNA in serum and liver in reproductive/developmental studies

As discussed above, comparisons between effect levels among animal studies of PFNA are most appropriately made on the basis of serum levels rather than administered dose. PFNA levels in serum and liver are reported in the two mouse studies (Das et al., 2015; Wolf et al.,

2010), but were not reported in the rat studies (Stump et al., 2008; Rogers et al., 2014). Das et al. (2015) measured PFNA levels in liver and serum in adult females and in fetal livers on GD 17 (one day after dosing ended), in adult females sacrificed on PND 28 (four weeks after dosing ended), and in pups on PND 1, 10, 24, 42, and 70. In Wolf et al. (2010), serum PFNA was measured in adult females and in two pups per litter only on PND 21 (23 days after the last dose).

While PFNA was not measured in breast milk in the mouse studies, the transfer of PFOA to milk in mice and the presence of PFCs including PFNA in human breast milk (discussed above) are well established (reviewed in White et al., 2011; Post et al., 2012). Exposure to PFNA in pups is therefore assumed to result from both *in utero* exposure to the PFNA administered to the mothers during pregnancy and from PFNA that was transferred to the breast milk after maternal dosing had ended.

The maternal serum data from GD 17 (one day after dosing ended) in CD-1 mice (Das et al., 2015) are valuable for quantitative risk assessment (see below) because they provide information on the maximum internal PFNA exposure to these mice at a time point when an endpoint for toxicity (maternal liver weight) was assessed. On GD 17, PFNA levels increased with dose in both serum and liver from pregnant and non-pregnant adult females, and in fetal livers. Serum levels were generally about twice as high in non-pregnant than in pregnant adult female mice, with the lower levels in the pregnant mice presumably due to transfer to the fetal compartment.

On PND 28 (post-weaning, four weeks after dosing ended), serum levels were lower in dams that had nursed than in pregnant mice on GD 17 at 1 and 3 mg/kg/day, but were similar in pregnant GD17 versus post-weaning adult females at 5 mg/kg/day (Das et al., 2015). Although these PND 28 data do not reflect the maximum internal PFNA exposures which may have caused toxicity, they do provide information on the time course of internal exposure and the persistence of PFNA in these mice.

PFNA concentrations in liver generally paralleled serum levels in pregnant, non-pregnant, and post-weaning (PND 28) female adults and were about 5-10 times higher than serum PFNA levels in the same animals (Das et al., 2015). The PFNA levels in fetal livers on GD 17 were similar to the maternal serum levels at the same time point.

Serum levels in offspring soon after birth (PND 1) were close to or higher than maternal serum levels at a similar time point (GD 17). In offspring, PFNA levels in serum and liver decreased over time, with a slower decline in liver than in serum. At PND 1, PFNA levels in liver were about 3-fold higher than in serum. By PND 70, PFNA in serum had decreased to about 4-7% of PND 1 levels, while liver PFNA concentrations on PND 70 were about 12-18% of PND 1 levels.

PFNA persisted at low levels in liver and serum of treated offspring until 43 weeks (10 months), the last time point assessed. In male offspring at age 10 months, PFNA in serum was about 1% of PND 1 levels, while in liver levels were about 2-4% of PND 1 levels; liver and serum levels in female offspring were lower than in males at this time point. (Numerical

data obtained from C. Lau).

In the study of WT and PPAR-alpha KO mice (Wolf et al., 2010), serum PFNA was measured in adult females and in two pups per litter on PND 21 (23 days after the last dose). The serum levels measured at this time point in the adult females would be considerably lower than at the end of the dosing period. This decrease reflects excretion of PFNA in all adult females (pregnant and non-pregnant), as well as transfer to breast milk in those adult females which had delivered and nursed live pups. These serum levels thus do not reflect the maximum internal PFNA exposures which may have resulted in the observed toxicity and are not appropriate for use in quantitative risk assessment. However, these data are useful for comparison of the doseresponse for toxicity in the two strains of mice (WT and PPAR-alpha KO) on the basis of internal, rather than external dose. Notably, in mice that had given birth, PFNA serum levels in the KO strain were much lower than in the WT strain given the same dose of PFNA, for reason(s) that were not determined.

## Maternal weight gain and pregnancy outcome

In CD-1 mice, PFNA at 10 mg/kg/day caused substantial maternal weight loss and 100% full litter resorptions (Das et al., 2015). At lower doses (≤5 mg/kg/day), maternal body weight gain was not affected, and there were no significant effects on reproductive parameters (full litter resorptions, the number of implants, number or percent live fetuses, prenatal liver loss, or fetal weight;Das et al, 2014).

The study of WT and PPAR-alpha KO mice suggests that PFNA caused both PPAR-alpha dependent and PPAR-alpha independent reproductive effects. PFNA (≤ 2 mg/kg/day) did not affect maternal weight gain, number of uterine implants, or number of live plus dead pups per litter in either strain of mice. In WT mice, the number of live pups at birth was decreased at all doses (significant at some doses), and percent litter loss was increased at the highest PFNA dose, but this change was not significant (Wolf et al., 2010). Pregnancy rate was significantly (p<0.001) reduced in the PPAR-alpha KO mice, but was not affected in WT mice, suggesting that PFNA affects implantation in the absence of functioning PPAR-alpha (Wolf et al., 2010).

In the two-generation rat study of Surflon S-111, the fertility index was significantly decreased only in the low dose (0.025 mg/kg/day Surflon S-111/ 0.019 mg/kg/day PFNA)  $F_0$  males and females. No effects were seen on other reproductive parameters in  $F_0$  or  $F_1$  rats. There were no effects on maternal weight gain or other parameters such as number of pups born and live litter size at any dose (Stump et al., 2008).

Maternal weight gain was significantly decreased in rats given a higher dose of PFNA, 5 mg/kg/day, on GD 1-20 (Rogers et al., 2014).

### Fetal abnormalities

PFNA did not increase in fetal skeletal or visceral abnormalities in fetuses in CD-1 mice (Das et al., 2015). These endpoints were not evaluated in the other reproductive/developmental studies.

#### Neonatal and postnatal mortality

PFNA caused neonatal mortality in gestationally exposed mouse pups and this effect appears to

be dependent on PPAR-alpha.

In CD-1 mice, pup survival was severely affected at 5 mg/kg/day, while this dose did not affect maternal weight gain, cause overt maternal toxicity, or impact pregnancy outcome (Das et al., 2015). Fewer than 20% of the 5 mg/kg/day pups survived to PND 21, compared to greater than 80% of the controls. The neonatal mortality in the 5 mg/kg/day offspring was gradual, with a sharp increase in pup deaths throughout the first 10 days of life. These pups were weak and failed to thrive, although lack of maternal care was not observed. Furthermore, milk was present in the stomachs of the pups after death, indicating that they had been able to suckle and swallow (C. Lau, personal communication).

Das et al. (2015) contrast the neonatal mortality from 5 mg/kg/day PFNA on PND 2-10 to the findings in similar studies with PFOA and PFOS conducted in the same laboratory (Lau et al., 2003; Lau et al., 2006). These other PFCs caused neonatal mortality in mice in the first two days of life at higher doses (10-20 mg/kg/day), but mortality did not continue to occur at later time points.

Das et al. (2015) suggest that the neonatal deaths in the 5 mg/kg/day PFNA pups may be due to effects on intermediary metabolism (i.e. the utilization of nutrients to produce energy needed for growth through glycolysis and other metabolic pathways). This conclusion is supported by studies showing that PFNA is more potent than PFOA or PFOS as an activator of PPAR-alpha, a receptor that is involved with regulation of intermediary metabolism (discussed in the Mode of Action section below).

In the study of WT and PPAR-alpha KO mice (Wolf et al., 2010), the number of live pups at birth and pup survival from birth to weaning was reduced in a dose-related fashion at all PFNA doses in WT groups, and these decreases were significant at the two highest doses. Most pup deaths occurred within the first few postnatal days, and WT pup survival at PND 21 was reduced to 36% at 1.5 mg/kg/day and 31% at 2 mg/kg/day. These parameters were not affected by PFNA in the PPAR-alpha KO mice.

There were no effects on postnatal survival in  $F_1$  or  $F_2$  pups in the two-generation rat study (Stump et al., 2008), and this endpoint was not assessed in the study of rats exposed to 5 mg/kg/day during pregnancy (Rogers et al., 2014).

#### Pup Body Weight

Body weights of CD-1 mouse pups on PND 1-24 were decreased by PFNA in a dose-related fashion at all doses, with statistical significance at 3 and 5 mg/kg/day (Das et al., 2015). At weaning, body weight decreases were substantial (27% and 50% lower than in controls at 3 and 5 mg/kg/day, respectively). These statistically significant body weight decrements persisted in both male and female offspring after weaning, and remained statistically significant in males until PND 287 (9 months of age) when most of the PFNA had been eliminated. It is the opinion of the study authors that the body weight decrements at 9 months of age are unlikely to be attributable to the low concentrations of PFNA remaining in the body at this time point (C. Lau, personal communication).

These persistent delays in growth from PFNA are in contrast to the findings in a PFOA study of similar design in CD-1 mice in the same laboratory (Lau et al., 2006). In the PFOA study, body weights of pups from mothers dosed with 3 or 5 mg/kg/day during gestation were 25-30% lower than controls at weaning, but recovered and reached control levels by age 6.5 weeks in males and 13 weeks in females.

Pup weight at birth was not affected by PFNA (≤ 2 mg/kg/day) in WT or KO mice (Wolf et al., 2010). Weight gain from birth until weaning was reduced in male and female WT pups at 2 mg/kg/day, but not at lower doses in WT or at any dose in PPAR-alpha KO pups.

In rats, there were no effects on body weight through weaning in F<sub>1</sub> or F<sub>2</sub> pups in the two-generation study (Stump et al., 2008) or at PND 21 through 56 weeks of age in offspring exposed gestationally to a higher dose, 5 mg/kg/day (Rogers et al., 2014).

# Developmental Delays

Markers of postnatal development were evaluated in three reproductive/developmental studies (Das et al., 2015; Wolf et al., 2010; Stump et al., 2008), but were not evaluated by Rogers et al. (2014).

In CD-1 mice, PFNA caused dose-dependent delays in day of eye opening, day of vaginal opening, and day of preputial separation, with statistically significant delays for all three endpoints in the 3 and 5 mg/kg/day PFNA groups (Das et al., 2015). The magnitude of these delays at 3 mg/kg/day PFNA were similar to those at the highest dose (20 mg/kg/day) in the analogous PFOA study (Lau et al., 2006), while 5 mg/kg/day PFNA caused much greater delays than 20 mg/kg/day PFOA (Table 8).

Table 8. Comparison of developmental delays in CD-1 mice from PFNA

Endpoint	PFNA (Das et al., 2015)	PFOA (Lau et al., 2006)	
	3 mg/kg/day	5 mg/kg/day	20 mg/kg/day
Eye opening	2 days	5 days	~3 days
Vaginal opening	3 days	7 days	~3 days
Preputial Separation	2 days	5 days	~1 day

Day of eye opening was also significantly delayed at 2 mg/kg/day PFNA in WT pups, but was not affected at lower doses in WT pups or at any dose in PPAR-alpha KO pups (Wolf et al., 2010). The other developmental endpoints evaluated by Das et al. (2015) were not assessed.

In the two-generation rat study (Stump et al., 2008), day of preputial separation and vaginal opening were not affected in  $F_1$  pups. These endpoints were not assessed in  $F_2$  pups, and day of eye opening was not evaluated.

# Effects on liver weight in adults, fetuses, and offspring *Adult females*

Effects on liver weight in adult females in the three reproductive/developmental studies are summarized in the section on Hepatic Toxicity and Table 7B (above). They are discussed in

more detail below because this endpoint is the basis for the quantitative risk assessment for PFNA (below). Liver weight was not assessed by Rogers et al. (2014).

Absolute and relative liver weights were statistically significantly increased in a dose-related fashion at all doses in pregnant and non-pregnant female CD-1 mice on GD 17 (Das et al, 2014). Maternal serum levels were also measured at this time point (discussed above). Dose-related statistically significant increases in absolute and relative liver weight persisted at the two higher doses (3 and 5 mg/kg/day) in dams on PND 28 (4 weeks after dosing ended).

Absolute and relative liver weights were increased by PFNA on PND 21 (23 days after the last dose) in both WT and PPAR-alpha KO mice (Wolf et al., 2010). Relative liver weights were increased at all doses in non-pregnant WT and PPAR-alpha KO mice, with significance in all groups except the lowest dose PPAR-alpha KO. In mice that had given birth, relative liver weight was significantly increased at all doses in WT, but was not increased in PPAPR-alpha KO at any dose. In interpreting these results, it is important to note that in mice that had given birth, PFNA serum levels in the KO mice were much lower than in the WT mice for reason(s) that were not determined. The NOAELs and LOAELs for increased liver weight based on serum levels are consistent in these WT and KO mice, suggesting that the differences in response is likely due to kinetic differences unrelated to PPAR-alpha status.

Absolute and relative liver weights were also increased in  $F_0$  and  $F_1$  females exposed to 0.6 mg/kg/day Surflon S-111 (0.44 mg/kg/day PFNA) for 18-21 weeks at post-weaning sacrifice (Stump et al., 2014). Lower dose groups were not evaluated.

## Fetal liver weights

In CD-1 mice, absolute and relative fetal liver weights were significantly increased at all doses of PFNA, except that the increase in absolute liver weight was not significant at 5 mg/kg/day. The magnitude of the increases in liver weight was similar in all dose groups (Das et al., 2015). This endpoint was not evaluated in the other two reproductive/developmental studies.

## Pup liver weights

Pup liver weight was evaluated at PND 1, 10, 24, 42, and 70 in CD-1 mice (Das et al., 2015), on PND 21 in WT and PPAR-alpha KO mice (Wolf et al., 2010), and on PND 21in F1 and F2 rats (Stump et al, 2008). This endpoint was not assessed by Rogers et al. (2014).

In CD-1 mouse pups, relative liver weights were increased in a dose-related fashion on PND 1 through PND 70. These increases were significant at all doses (1, 3, and 5 mg/kg/day) on PND 1 and 24, and at 3 and 5 mg/kg/day on PND 42 (Das et al., 2015).

In the study of WT and KO mice, relative liver weight on PND 21 was increased at all doses ( $\geq$  0.83 mg/kg/day) in WT mice but only at the highest dose (2 mg/kg/day) in PPAR-alpha KO mice (Wolf et al., 2010).

In rats in the two generation study, relative liver weights on PND 21 were significantly increased at  $\geq 0.125$  mg/kg/day Surflon S-111 (0.09 mg/kg/day PFNA) in F<sub>1</sub> pups and at 0.6 mg/kg/day Surflon S-111 (0.44 mg/kg/day PFNA) in F<sub>2</sub> pups.

## Elevated blood pressure in offspring

This endpoint was evaluated only by Rogers et al. (2014). Systolic blood pressure was significantly increased on PND 10 in male and female rat pups after gestational exposure to 5 mg/kg/day PFNA. Blood pressure was not increased at later time points (PND 26 and 56). In male pups, nephron endowment (number of functioning nephrons present at birth) in renal glomeruli was significantly decreased when evaluated on PND 22; no effect was observed in female pups. These changes in nephron endowment were not associated with changes in body weight or kidney weight.

## Summary of reproductive/developmental effects

In both mouse studies, PFNA caused dose-dependent maternal and developmental effects including postnatal mortality, decreased pup weight gain, and delays in reaching markers of development (Das et al., 2015; Wolf et al., 2010). It is notable that decreased growth from developmental exposure persisted well into adulthood (age 9 months), long after PFNA had been eliminated from the serum (Das et al., 2015). Both Das et al. (2015) and Wolf et al. (2010) conclude that PFNA is more potent than PFOA as a developmental toxicant, based on studies of PFOA in the same strains of mice used in the PFNA studies (Lau et al., 2006: Abbott et al., 2007). The greater toxicity of PFNA as compared to PFOA is likely related to its greater intrinsic potency and longer persistence in the body.

As discussed in the <u>Mode of Action</u> section below, PPAR-alpha is considered to have an important role in human reproduction and development (Abbott, 2009). Developmental parameters (number of live pups per litter, pup survival, day of eye opening, pup weight gain) were adversely affected by PFNA only in the WT mice (Wolf et al., 2010). Based on higher serum levels in PPAR-alpha KO pups than WT pups, the authors conclude that the lack of effects in PPAR-alpha KO pups is not attributable to lower PFNA levels in their serum. The developmental effects of PFNA seen in this study thus appear to be dependent on PPAR-alpha. In contrast, pregnancy rate was significantly affected by PFNA in the PPAR-alpha KO but not the WT strain, suggesting that the presence of functioning PPAR-alpha prevents this effect.

Decreased maternal body weight gain, decreased neonatal weight, and delayed development of pups (reduced body weight gain, delayed age of markers development) were not observed in the rat two-generation study (Stump et al., 2008), although a higher dose of PFNA (5 mg/kg/day) caused decreased maternal weight gain and decreased pup weight at birth in rats (Rogers et al., 2014). Relevant to this point, the highest dose used in the rat two-generation study (0.44 mg/kg/day PFNA) was lower than the lowest doses in the mouse studies (0.83 and 1 mg/kg/day) and PFNA serum data are not available for this study. These results from developmental studies of PFNA in rats and mice are consistent with results in mice and rats for the related compound, PFOA (reviewed in Post et al., 2012). As is the case for PFOA, the rat may not be an appropriate model for assessment of developmental effects of PFNA because it is eliminated much more rapidly in female rats than in female mice (see <u>Toxicokinetics</u>, above). For this reason, the developing rat fetus receives a much lower dose than the developing mouse fetus at the same maternally administered dose.

## Additional considerations related to developmental toxicity

The potential for PFNA to cause the specific low-dose developmental effects seen in mice given 0.01 mg/kg/day of the closely related compound, PFOA, including delayed mammary gland development and histopathological effects on female reproductive system (reviewed in Post et al., 2012; Tucker et al., 2014), has not been evaluated. Other long chain PFCs, including PFOA, PFOS, and PFHxS, caused neurobehavioral effects in mice after developmental exposures (Johansson et al., 2008: Viberg et al., 2013), but PFNA has not been tested for these effects.

# Additional systemic endpoints

In the subchronic and the two-generation studies of Surflon S-111 in rats (Mertens et al., 2010; Stump et al., 2008), effects were reported on several endpoints that were not included in other toxicology studies.

## Hematology

In the subchronic study (Mertens et al., 2010), several hematological parameters were affected in the high dose (0.6 mg/kg/day Surflon S-111; 0.44 mg/kg/day PFNA) males at the end of the 13 week dosing and/or after the recovery period at week 21. These include increased prothrombin time and lymphocytes, and decreased red cells, hemoglobin, and hematocrit, and reticulocytes. No effects were seen in females.

# Clinical Chemistry

In the high dose (0.6 mg/kg/day) males in the subchronic study (Mertens et al., 2010), serum protein and globulin were decreased, and bilirubin, BUN, chloride (data not shown), and alkaline phosphatase were increased. In the mid dose (0.125 mg/kg/day) males and high dose (0.6 mg/kg/day Surflon S-111; 0.44 mg/kg/day PFNA) females, only increased alkaline phosphatase and decreased globulin were observed. The effects on these clinical chemistry parameters were more pronounced in males than females.

In an unpublished study of Surflon S-111 in male rats (Wolterbeek, 2004), serum phospholipids, cholesterol, and calcium were decreased in male rats in all dose groups (0.1, 0.5, and 2 mg/kg/day) after 14 days of exposure. Calcium and cholesterol were not affected in the 90 day study and phospholipids were not measured (Mertens et al., 2010).

#### Gastrointestinal Effects

Inflammation, ulceration, erosion, and hyperplasia occurred in the duodenum and stomach of some males in the 0.6 mg/kg/day Surflon S-111 (0.44 mg/kg/day PFNA) group. Minimal stomach erosion persisted in one male in the recovery group. In females, only the control and high dose (0.6 mg/kg/day Surflon S-111, 0.44 mg/kg/day PFNA) were evaluated, and these effects were not seen. Histopathological examination of the gastrointestinal organs was not performed in the rat two generation study of Surflon S-111 (Stump et al., 2010).

# Chronic effects and carcinogenicity

Chronic studies, including studies designed to detect carcinogenicity have not been conducted for PFNA. PFOA and PFOS, the two long-chain biologically persistent PFCs for which chronic studies have been conducted, caused tumors in rats (Sibinski, 1987; Biegel et al., 2001; Thomford et al., 2002).

## Summary of toxicity in experimental animals

PFNA and/or Surflon S-111 (a mixture of PFCs consisting primarily of PFNA) caused multiple toxic effects in rats and mice. Detailed evaluation of the results of the Surflon S-111 studies support the conclusion that its toxicity is primarily caused by PFNA.

Effects of PFNA (and/or Surflon S-111) in rodents include body weight loss, increased liver weight and histopathological changes in the liver including necrosis, increased kidney weight and histopathological changes in the kidney, atrophy of spleen and thymus and changes in immune cell populations in these organs, histopathological changes and other effects in the testes, decreased pregnancy rate, maternal weight loss and full litter resorptions, neonatal and postnatal mortality, decreased weight gain persisting into adulthood in offspring, and delays in reaching markers of postnatal development.

Reproductive/developmental studies of both PFNA and the closely related compound, PFOA, have been conducted in CD-1 mice and in WT and PPAR-alpha KO mice. Comparison of the results of the studies of these two compounds indicates that PFNA is more toxic to reproduction and development than PFOA. Similarly, authors of the subchronic and two generation rat studies of Surflon S-111 concluded that Surflon S-111 is more toxic than PFOA, based on comparison with similar studies of PFOA in rats (Mertens et al., 2010; Stump et al., 2008). Notably, similar decreases in body weight in males occurred from 0.6 mg/kg/day Surflon S-111 (0.44 mg/kg/day PFNA) and 30 mg/kg/day PFOA in two generation studies (Stump et al., 2008). The greater toxicity of PFNA as compared to PFOA is likely due to both its longer persistence in the body and its higher intrinsic potency.

PFNA causes both PPAR-alpha dependent and PPAR-alpha independent toxicity, as is also true for PFOA. PFNA caused increased liver weight (adult, fetal, and pup) in both WT and PPAR-alpha KO mice. Some developmental/reproductive effects (number of live pups per litter, pup survival, day of eye opening, pup weight gain) occurred only in WT mice. Based on knowledge of the role of PPAR-alpha in human reproduction and development, these PPAR-alpha dependent effects are considered relevant to humans. In contrast, pregnancy rate was decreased by PFNA only in PPAR-alpha KO mice. Additionally, PFNA caused hepatic necrosis, an effect not typically associated with PPAR-alpha activation, at a dose which did not increase liver weight in rats exposed for 18-21 weeks.

Some endpoints of toxicity, including increased kidney weight and histopathological changes in the kidney, occurred after 18-21 weeks of exposure in the two-generation study, but not in the 13 week subchronic study which used the same doses of Surflon S-111. Furthermore, hepatic necrosis occurred only at the highest dose in the 13 week study but at all doses in the 18-21 week study. These results suggest that 13 weeks not a sufficient exposure duration to produce some of the effects that occur from longer exposures, and that toxicity occurs at lower doses from exposures longer than 13 weeks.

The half-life of PFNA differs among species and is much shorter in female rats than male rats. As expected from the rapid excretion of PFNA in female rats, higher administered doses were required to cause toxicity in female rats than in male rats. Similarly, reproductive and developmental effects occurred at higher administered doses in rats than in mice, a species in

which females excrete PFNA slowly.

Because of the large differences in excretion rates in species and genders, quantitative risk assessment and extrapolation to human exposure levels are most appropriately based on internal dose (serum level) rather than administered dose. PFNA serum levels are available at the same time point as toxicity (increased liver weight) was evaluated in one 14 day study in male mice and one reproductive/developmental study in mice. Additionally, serum levels that can be roughly estimated from graphs provided in the subchronic rat study are useful for comparison to other studies but are not appropriate for quantitative risk assessment.

Although the studies that do not provide data on PFNA serum levels are not appropriate as the basis for quantitative risk assessment, results of some of these studies suggest that PFNA causes toxicity at internal doses lower than in the studies which do provide serum levels. Effects on the immune system and male reproductive system occurred at lower administered doses than those which caused increased liver weight in the mouse studies that provide PFNA serum level data; the duration of exposure was similar in all of these studies. Additionally, toxicity, including hepatic necrosis, occurred in the rat two-generation study at estimated serum levels below those which caused increased liver weight in mice; histopathology was not evaluated in these mouse studies.

There are several important data gaps in the toxicity information available for PFNA. Chronic studies, including studies designed to detect carcinogenicity, have not been conducted. The two other long chain PFCs (PFOA and PFOS) that have been tested chronically caused tumors in rats. Furthermore, additional non-carcinogenic toxicity from longer exposure durations may occur with chronic exposure. A two-generation study of PFNA in a species, such as the mouse, that is appropriate for evaluating reproductive/developmental effects has not been conducted. Additionally, the potential for PFNA to cause the specific low-dose developmental effects seen in mice at low doses of PFOA, including delayed mammary gland development, has not been evaluated. Finally, PFNA has not been tested for developmental neurotoxicity, such as has been found in studies of other long chain PFCs.

# **MODE OF ACTION**

Although there is a considerable body of information on the mode(s) of action (MOA) for PFNA and other PFCs, the MOA of these compounds has not been fully characterized.

Perfluorinated carboxylic acids such as PFNA structurally resemble free fatty acids, and thus may act similarly to a free fatty acid in activating nuclear receptors such as PPAR-alpha, CAR (constitutive androstane receptor) and PXR (pregnane X receptor), binding to transporters and carrier proteins, and interacting with membranes (Butenhoff, 2009). However, PFNA and other PFCs are non-reactive and thus are not substrates for biochemical reactions involving fatty acids.

#### Genotoxicity

In general, because PFNA and other PFCs are non-reactive and are not metabolized to reactive intermediates, they do not covalently bind to nucleic acids and proteins and are therefore unlikely to be genotoxic. PFOA and PFOS were not mutagenic in several *in vitro* assays in

bacterial and mammalian cells, and did not induce micronuclei in mice *in vivo* (reviewed by USEPA, 2005; ATSDR, 2009). Only one study of the genotoxic potential of PFNA was located (Eriksen et al., 2010). In this study, five PFCs (PFNA, PFOA, PFHxA (C6), PFOS, and perfluorobutane sulfonic acid) were evaluated for their potential to generate reactive oxygen species and cause oxidative DNA damage in human HepG2 cells. Of the PFCs tested, only PFNA caused a modest but statistically significant increase in DNA strand breaks at concentrations of  $100~\mu\text{M}$  and  $400~\mu\text{M}$ , but this effect of PFNA was not related to generation of reactive oxygen species. Although it was stated that PFNA increased strand breaks only at cytotoxic concentrations, this point is unclear because cytotoxicity did not occur at  $100~\mu\text{M}$  PFNA.

## PPAR-alpha dependent and PPAR-alpha independent effects

PFNA activates PPAR-alpha, as well as other nuclear receptors such as constitutive androstane receptor (CAR) and and pregnane X receptor (PXR), in rodents (Rosen et al., 2010; Das et al., 2015). These receptors are found in many tissues, and activation of these receptors affects the expression of genes involved in many pathways related to carcinogenicity, hepatotoxicity, metabolic functions, developmental toxicity, immunotoxicity, and other effects (Lau, 2012). Like other long chain PFCs, PFNA increases the activity of hepatic peroxisomal beta-oxidation biochemical, a marker for hepatic peroxisome proliferation in mice and rats (Goecke-Flora and Reo, 1996; Kudo et al., 2000; Kudo and Kawashima, 2003; Kudo et al., 2006; Mertens et al., 2010). PFNA induced the expression of genes in functional categories normally associated with PPAR-alpha in both WT and PPAR-alpha KO mice, suggesting that other PPAR isoforms (i.e. beta, delta, and/or gamma) present in the PPAR-alpha KO mice are activated by PFNA (Rosen et al., 2010). Genes associated with CAR were also activated by PFNA in WT and PPAR-alpha KO mice (Rosen et al., 2010).

PPAR-alpha is found in human liver, and fibrate drugs bring about decreases in cholesterol and lipids in humans through activation of hepatic PPAR-alpha. However, the human relevance of hepatic toxicity in rodents by environmental contaminants that activate PPAR-alpha has been subject to debate because of the lower levels and/or lower intrinsic activity of PPAR-alpha in human liver (reviewed in Post et al., 2012). The hepatic effects of PFNA in rodents have both PPAR-alpha dependent and PPAR-alpha independent components (Rosen et al., 2010; Wolf et al., 2010). Absolute and relative liver weights were increased by PFNA in both wild type (WT) and PPAR-alpha knockout (KO) mice (Wolf et al., 2010). In mice that had given birth, the magnitude of increased liver weight in WT and KO mice were similar when the two strains were compared on the basis of PFNA serum levels 23 days after dosing ended (Wolf et al., 2010). Additionally, PFNA caused hepatic necrosis, an effect not typically associated with PPAR-alpha activation, at a dose which did not increase liver weight in rats exposed for 18-21 weeks (Stump et al., 2008).

Furthermore, it is well established that the observed hepatic toxicity of PFOA has both PPAR-alpha dependent and PPAR-alpha independent components (reviewed in Post et al., 2012). Two recent studies provide important additional data related to this issue. In CD-1 mice exposed *in utero* to PFOA, hepatocellular hypertrophy was observed at 3 and 13 weeks of age. These changes were accompanied by mitochondrial alterations in the liver cells, while there was no evidence of hepatic peroxisome proliferation, a marker of PPAR-alpha activation (Quist et al.,

2014). A second study evaluated liver lesions at age 18 months in CD-1, WT, and PPAR-alpha KO mice with prenatal exposure to PFOA (Filgo et al., 2014). Liver carcinomas and/or adenomas did not occur in controls in any of the three mouse strains, but were found in PFOA-treated CD-1 and PPAR-alpha KO mice, but not WT mice. Non-neoplastic hepatic effects (hepatocellular hypertrophy, bile duct hyperplasia, and hematopoietic cell proliferation) were more frequent and/or more severe in PPAR-alpha KO than WT mice.

Wang et al. (2014b) found that PFNA caused increased hepatic lipids only at lower doses (0.2 and 1 mg/kg/day, but not 5 mg/kg/day). In contrast, serum lipids were decreased only at the two highest doses. PFNA affected expression of genes and proteins leading to up-regulation of both PPAR-alpha and sterol regulatory element-binding proteins (SREBPs). PPAR-alpha promotes fatty acid oxidation and lipolysis, leading to decreased hepatic and serum lipids, while SREBPs have the opposite effect, promotion of lipid biosynthesis leading to increased hepatic and serum lipids. Wang et al. (2014b) concluded that the different changes in serum and hepatic lipids at low versus high PFNA doses may result from the balance between these opposing effects. A potential explanation for the increased serum levels from PFNA and other PFCs in humans, but not rodents, is that these the balance between lipolysis and lipid biosynthesis may differ in these species due to interspecies differences in PPAR-alpha versus SREPBs.

Some developmental/reproductive effects of PFNA (number of live pups per litter, pup survival, day of eye opening, pup weight gain) occurred only in WT mice and appear to be PPAR-alpha dependent, while pregnancy rate was decreased by PFNA only in PPAR-alpha KO mice. The uncertainty about human relevance of hepatic effects of PPAR-alpha does not apply to PPARalpha's role in developmental toxicity and other non-hepatic effects, or to other PPAR isoforms such as PPAR-gamma. PPAR-alpha and other PPAR isoforms are expressed in many fetal and adult tissues in rodents and humans (Abbott et al., 2010). Based on their physiological roles, PPAR-alpha and other forms of PPAR are expected to have important roles in reproduction and development in these species (Abbott, 2009). In regard to human relevance of PPAR-alpha mediated effects of PFNA on development in mice, Wolf et al. (2010) state: "Relevance of the PPAR-alpha mechanism to humans has been criticized primarily based on the lower number of these receptors in the liver of human versus mouse. However, PPARa is implicated here in the developmental effects of PFNA as well, and the etiology of PPARa in other tissues of the embryo, fetus and neonate of the human and the mouse that are involved in gross development has not been fully determined. Therefore, the possibility of relevance of PPAR $\alpha$  to a human response to PFNA cannot be dismissed." Additionally, the USEPA Science Advisory Board (2006) concluded that available data are insufficient to dismiss the relevance of the PPAR-alpha MOA in children.

Das et al. (2015) suggest that the neonatal deaths in the 5 mg/kg/day PFNA pups may be due to effects on intermediary metabolism (i.e. the utilization of nutrients to produce energy needed for growth through glycolysis and other metabolic pathways). Gene expression profiles in livers from fetuses and pups exposed to PFNA during gestation showed activation of expression of genes related to homeostatic control of lipid and glucose metabolism, including PPAR-alpha, CAR, and PXR (Das et al., 2015). A similar hypothesis has been suggested for the neonatal mortality and decreased pup growth caused by PFOA. Like PFNA, gestational exposure to

PFOA affected the expression of genes associated with PPAR-alpha, other PPARs, CAR, and PXR, in both fetal and neonatal mice (Rosen et al., 2007; Abbott et al., 2010).

Both PPAR-alpha and PPAR-gamma were activated by PFNA in the thymus of mice and rats and in rat spleen (Fang et al., 2008, 2009, 2010). Based on these results, Lin et al. (2011) hypothesize that the increased levels of the hormone adiponectin associated with human PFNA exposure may be related to activation of PPAR-gamma. In the mouse thymus, PPAR-alpha and PPAR-gamma were activated at only the lowest dose of PFNA, while immunotoxicity was more severe at higher doses. The authors concluded that some immunotoxic effects are independent of both PPAR-alpha and PPAR-gamma and may be due to increased levels of ACTH and cortisol (Fang et al., 2008).

Estrogenic activity may also be involved in the mode of action of PFNA and other PFCs. Studies in rainbow trout, which have long been used as a model for human liver carcinogenesis because they are insensitive to peroxisome proliferation, suggest that PFNA and other PFCs have estrogenic activity and can promote liver tumor development through an estrogenic mechanism (Benninghoff et al., 2011, 2012).

#### Other MOA studies

The toxicity of PFNA in rodent spleen and thymus is associated with impairment of cell cycle progression and increased apoptosis in these immune system organs (Fang et al., 2008, 2009, 2010). The proportion of less mature versus mature cells in the thymus was affected by PFNA (Fang et al., 2008). In the spleen, the innate splenic immune cells appeared to be a specific target for PFNA. Potential modes of action for the immunotoxic effects of PFNA suggested by these studies include increased levels of the hormones ACTH and cortisol, altered levels of cytokines which regulate immune function, and induction of apoptosis via oxidative stress and activation of a mitochondria-related caspase-independent death signaling pathway.

The mode of action for testicular toxicity of PFNA in rats was investigated by Feng et al. (2009; 2010). Histological examination, staining for DNA fragmentation (TUNEL assay), and flow cytometry showed that apoptosis in testicular cells was increased in a dose-dependent manner by PFNA (Feng et al., 2009). Two independent pathways are involved with apoptosis in the testes. Data on gene expression and protein levels in the testes suggested that PFNA activates the death receptor pathway, but not the mitochondrial-dependent pathway, for apoptosis.

PFNA exposure affects multiple functions of Sertoli cells, testicular cells important for spermatogenesis (Feng et al., 2010). The ultrastructural disruptions observed *in vivo* may be related to up-regulation of the intermediate filament protein vimentin. PFNA affected levels in testes or serum of four proteins secreted by Sertoli cells, and these effects are consistent with *in vitro* studies of primary cultured Sertoli cells. Increases in MIS, WT1, and ABP may indirectly reduce free testosterone in testes, consistent with decreased testosterone in PFNA- treated rats observed by Feng et al. (2009). Decreased inhibin B may indicate impaired secretory function of Sertoli cells and testicular sperm production; it is considered a marker for testicular toxicity. Decreases in transferrin and FSH-R caused by PFNA may impair spermatogenesis in the testes. Transferrin delivers iron needed for sperm production to the germ cells and FSH-R (the receptor for FSH) regulates many Sertoli cell functions.

Fang et al. (2012a, b) suggest that effects on both Kupffer cells (hepatic macrophages) and hepatocytes contribute to the liver toxicity of PFNA. PFNA affected both expression of genes related to lipid metabolism in hepatocytes and release of cytokines related to inflammation from Kupffer cells (Fang et al., 2012a). Exposure to PFNA activates Kupffer cells, leading to release of the cytokines TNF alpha and IL1-beta. These cytokines suppress the expression of hepatic PPAR-alpha in hepatocytes, contribute to the accumulation of lipids in the liver, and increase the toxicity of PFNA to hepatocytes as assessed by serum liver enzyme levels. Consistent with these effects, inactivation of Kupffer cells by GdCl<sub>3</sub> affected the hepatic effects of PFNA. When Kupffer cells were inactivated, PFNA caused greater expression of PPAR-alpha, smaller increases in hepatic triglycerides, and smaller increases in serum levels of liver enzymes. *In vitro* studies were consistent with the in *vivo* studies.

Fang et al. (2012c) investigated potential modes of action for increases in serum glucose and hepatic glycogen caused by PFNA in mice. Hepatic levels of four proteins that are part of the insulin signaling pathway were significantly reduced at all doses of PFNA. A decrease in this pathway can induce insulin resistance leading to increased serum glucose. Additionally, hepatic levels of another protein, p-GSK3-beta, which is responsible for glycogen synthesis in the liver were increased at all doses, potentially explaining the observed increase in liver glycogen. Because the levels of p-GSK3-beta are regulated by the insulin signaling pathway, the increased levels of this protein could result from the inhibition of the insulin signaling pathway by PFNA. Oxidative stress may be involved in inhibiting the insulin signaling pathway.

Additional modes of action for PFNA and other PFCs have been suggested including oxidative stress, effects on other cell signaling pathways, inhibition of gap junctional intercellular communication, and epigenetic changes (reviewed by Lau, 2012).

## MOA studies in zebrafish

Zebrafish are a useful vertebrate model for evaluating the toxicity of environmental contaminants because of their rapid development and the similarity of their genetic makeup, developmental processes, anatomy, physiology, and behavior. Studies of PFNA in zebrafish have evaluated effects on the liver, thyroid, development, and behavior. PFNA caused hepatic and thyroid toxicity at relatively low concentrations (0.05 - 0.1 mg/L) with no NOAEL identified, while developmental toxicity and behavioral effects occurred at higher PFNA concentrations.

Zhang et al. (2012a) studied liver toxicity and hepatic protein and gene expression in male zebrafish exposed to PFNA (0. 0.1, 0.5, and 1.0 mg/L) for 180 days. Histopathological changes in the liver became more severe as PFNA concentration increased and were similar to those observed in rodents exposed to PFNA. Hepatic expression of 57 proteins related to many different function including metabolism of amino acids, tricarboxylic acid cycle intermediates, pyruvate, glucose, proteins, and nucleotides; structure and motility; stress and defense; signal transduction; and cell communication were affected at all PFNA concentrations. Results of gene expression studies indicated that the liver toxicity caused by PFNA could not be totally attributed to PPAR-mediated effects.

Hepatic effects differed in male versus female zebrafish exposed to PFNA (0, 0.01, 0.1, or 1 mg/L) for 180 days (Zhang et al., 2012b). PFNA levels were higher in males than in females exposed to the same concentration. In both sexes, body weight and length were decreased in a dose-dependent manner and hepatosomatic index (relative liver weight) was decreased significantly at lower doses, but not the high dose. In liver, total cholesterol was increased in both sexes, but triglycerides were increased in males and decreased in females. Furthermore, the pattern of expression of genes for 11 hepatic fatty acid binding protein in response to PFNA differed greatly between sexes. Expression 10 isoforms was increased in males and decreased in females exposed to PFNA, while one isoform showed the opposite pattern. PFNA also affected the expression of genes for proteins involved in regulation of fatty acid binding proteins (PPARs and Ccaat-enhancer binding proteins) differently in males and females.

Toxicity to the thyroid was reported in a trans-generational study of zebrafish exposed to PFNA (0, 0.05, 0.1, 0.5, and 1 mg/L) for 180 days (Liu et al., 2011b). In F<sub>0</sub> males exposed for 180 days starting at 23 days post fertilization, histopathological changes in the thyroid occurred at all PFNA concentrations and became more severe at higher concentrations. Plasma triiodothyronine (T3) was increased in the adult fish examined (F<sub>0</sub> males, and F<sub>1</sub> males and females) at concentrations as low as 0.05 mg/L. In livers of F<sub>0</sub> males, PFNA induced transthyretin, a protein involved with thyroid hormone transport, and decreased UDP-glucuronosyltransferases, an enzyme involved with thyroid metabolism. Gene expression related to thyroid hormone synthesis and metabolism was affected in F<sub>1</sub> larvae from parents exposed to PFNA, but that had developed in a PFNA-free environment, indicating that PFNA caused a trans-generational effect.

In a study of the effects of a series of PFCs on zebrafish development, fertilized eggs were exposed to PFNA (0, 6.25, 12.5, 25, 50, 100, and 200 mg/L). The developing embryos/larvae were examined before and after hatching until 96 hpf (hours post fertilization) (Zheng et al., 2012). At 72 hpf, the LC<sub>50</sub> concentrations for lethality (opaque embryos) and the EC<sub>50</sub> for delay of hatching (84 mg/L and 214 mg/L), respectively, were relatively high compared to concentrations of environmental concern. PFNA did not increase the occurrence of edema or malformations. Consistent with the results of this study, PFNA was not reported to cause malformations in rats or mice (Das et al., 2015; Stump et al., 2008). Based on LC<sub>50</sub> values at 72 hpf, the relative potency of PFCs tested in this study was PFOS>PFNA>PFOA.

In a second study comparing developmental toxicity of a series of PFCs, fertilized zebrafish eggs were exposed to six concentrations of PFNA (0.03 – 10 mg/L) until 144 hpf (Ulhaq et al., 2013a). The LC<sub>50</sub> was greater than 10 mg/L, and there was no effect on heart rate or hatching time within this concentration range. For sublethal effects, including spinal curvature, the EC<sub>50</sub> was 16 mg/L. The relative toxicity of PFNA compare to other PFCs tested was PFOS>PFDA (C10)>PFNA>PFBS>PFBA, consistent with Zheng et al. (2012).

An additional study from this research group (Ulhaq et al., 2013b) evaluated effects on locomotor behavior in zebrafish larvae at PFC concentrations below those which caused lethality and/or overt toxicity. Exposure to PFNA at 10 mg/L caused a reduction in the activity of the zebrafish, while lower concentration ( $\leq$  3 mg/L) had no effect.

# Relative potencies of PFNA and other PFCs

Based on comparison with similar studies of PFOA, PFNA (and Surflon S-111 consisting primarily of PFNA) is more potent than PFOA for developmental and systemic toxicity (Das et al., 2015; Mertens et al., 2010; Stump et al., 2008, Wolf et al., 2010). In support of this conclusion, PFNA (1 mg/kg/day) altered the expression of more genes than PFOA (3 mg/kg/day) in both WT and PPAR-alpha KO mice dosed for 7 days (Rosen et al, 2010). The greater toxicity of PFNA is likely due to both its longer persistence in the body (discussed above) and its greater intrinsic potency (discussed below).

In vitro studies of activation of mouse or human PPAR-alpha transfected into cultured cells by a series of PFCs provide information on the relative potency of these compounds for activation of PPAR-alpha. Based on the concentration eliciting 20% of maximal response, PFNA was the most potent activator of both mouse and human PPAR-alpha in a study of PFBA (C4), PFHxA (C6), PFOA (C8), PFNA (C9), and PFDA (C10) (Wolf et al., 2008). In a follow-up study that tested additional PFCs (Wolf et al., 2012), PFUnDA (C11) and PFDoA (C12) were less potent activators of both the human and mouse PPAR-alpha receptors than PFNA, with particularly low activity for activation of the human receptor, indicating that potency for this effect in a series of perfluorocarboxylic acids does not necessarily increase with greater carbon chain length. It should be noted that activity in this assay is a measure of intrinsic potency and is independent of differences in half-life or other toxicokinetic parameters.

Gene activation profiles of a series of twelve PFCs including PFNA were also studied in primary hepatocytes from humans and mice (Rosen et al., 2013). PFNA was the most active PFC in human cells, based on the average molarity producing a 2-fold change in gene expression, and was also among the more active PFCs in mouse cells. However, the study's authors discuss results that indicate that primary hepatocytes are problematic as a model for *in vitro* effects, since many genes that are well known to be up-regulated by PFCs *in vivo* were not affected in these *in vitro* cell assays.

PFNA was also more potent than PFOA as a promoter of liver tumor development in rainbow trout after initiation with aflatoxin B1 (Benninghoff et al., 2011). The liver tumor incidence after initiation with AFB was 13% with no promoter, 62% after promotion with PFOA (50 mg/kg/day), and 72% after promotion with PFNA (25 mg/kg/day). The percent of hepatic tumors which were adenomas (as opposed to carcinomas) was 30%, 15%, and 8% in the non-promoter, PFOA, and PFNA groups, respectively (Benninghoff et al., 2011). The number of tumors per fish and the mean tumor size were also higher for PFNA than PFOA. In another part of the study, changes in hepatic gene expression from PFCs were assessed. PFNA altered the expression of most of the same genes affected by PFOA and perfluorodecanoic acid (C10), but also altered the expression of a group of other genes not affected by the other two PFCs. In a subsequent study (Benninghoff et al., 2012), PFNA, as well as PFOA and PFDA, induced the estrogen-dependent biomarker protein vitellogenin in young rainbow trout, and these PFCs also weakly activated the rainbow trout and human estrogen receptors *in vitro*.

Two additional studies evaluated the effects of PFNA and six other PFCs on *in vitro* effects on receptors for thyroid hormones, aryl hydrocarbons (AhR), androgens (AR), and estrogens (ER). The PFCs included in these studies were PFOA, PFNA, PFDA (C10), PFUnA (C11), PFDoA

(C12), PFHxS, and PFOS. In the widely used T-screen assay, all of the PFCs except PFOA antagonized the effect of the thyroid hormone T3 on the growth of cultured rat pituitary GH3 cells. The potency of PFNA was similar to most of the other PFCs that caused this effect (Kjeldsen and Bonefeld-Jorgensen, 2013). Of the seven PFCs tested, only C10 and C12 activated AhR (Kjeldsen and Bonefeld-Jorgensen, 2013). PFNA did not induce transactivity of ER, while PFOA, PFOS, and PFHxS did cause this effect (Long et al., 2013). PFNA, as well as PFOA, PFOS, PFHxS, and C10, antagonized the effect of dihydrotestosterone on AR, and a mixture of these five PFCs caused a greater than additive effect on this endpoint (Long et al., 2013).

# **DEVELOPMENT OF HEALTH-BASED MCL**

# Weight of Evidence for Carcinogenicity

Health-based MCLs developed by the DWQI are intended to be protective for chronic (lifetime exposure) through drinking water. The 1984 Amendments to the NJ SDWA stipulate that Health-based MCLs are based on a one in one million lifetime cancer risk level for carcinogens and no adverse effects from lifetime ingestion for non-carcinogens.

There is no available information that can be used to evaluate the carcinogenic potential of PFNA because chronic carcinogenicity bioassays have not been conducted. Therefore, the Health-based MCL for PFNA is based on non-carcinogenic effects.

#### Key and Supporting Studies and Endpoints

Both the human epidemiology data and the animal toxicology were considered as part of the overall weight of evidence for the potential human health effects of PFNA. While some studies found associations of PFNA with health effects at exposures found in the general population, the extent of the available epidemiology data for PFNA is limited. Causality cannot be proven for the associations that were reported since they primarily come from cross-sectional studies. Therefore, human data were not used as the basis for the quantitative risk assessment. Because human epidemiology data were not used as the primary basis for risk assessment, a formal weight of evidence evaluation of causality for the human studies was not conducted.

The quantitative basis for the interim ground water standard is increased liver weight in pregnant mice in a developmental study conducted by USEPA in which mice were dosed with 0, 1, 3, or 5 mg/kg/day PFNA throughout gestation (Das et al., 2015). Increased liver weight is a well-established effect of PFNA and other PFCs in experimental animals. Das et al. (2015) was selected as the only study appropriate for use as the basis for quantitative risk assessment because it provides the numerical serum PFNA data, including statistical parameters, needed for benchmark dose (BMD) modeling. (These numerical data were provided by C. Lau.) PFNA serum levels at the time point when liver weight was measured are also available in a study of male mice exposed to 0, 0.2, 1, or 5 mg/kg/day PFNA for 14 days (Wang et al., 2014b). When compared on the basis of PFNA serum levels, the NOAELs and LOAELs for increased liver weight (Table 9) are consistent in male mice (Wang et al., 2014b) and pregnant female mice (Das et al., 2015), and the dose-response curves for increased relative liver weight are almost identical in the two studies.

Table 9. PFNA serum level NOAELs and LOAELs for increased liver weight in mice

	NOAEL (ng/ml)	LOAEL (ng/ml)
Pregnant mice		13,700
(Das et al., 2015)		
Male mice		11,500
(Wang et al., 2014b)		

The only other toxicology studies for which serum PFNA data were reported numerically is the developmental toxicity study in WT and PPAR-alpha KO mice (Wolf et al., 2010). In Wolf et al. (2010), serum PFNA levels were measured 23 days after dosing ended. At this time point, a considerable portion of the PFNA would have been excreted, with additional loss of PFNA through transfer to breast milk in the lactating dams. Thus, these serum levels are not indicative of the exposure levels which resulted in toxicity and are not suitable for use as the basis for quantitative risk assessment.

In the studies of the Surflon S-111 PFC mixture consisting primarily of PFNA, Mertens et al. (2010) present serum PFC levels over time in each dosed group in graphs but do not provide the numerical data that are needed for dose-response modeling. Additionally, the data for the lower serum levels cannot be accurately estimated from the graphs, due to their scale. Stump et al. (2008) provides only area under the curve graphs for serum levels of the Surflon S-111 mixture, and no serum data is presented for individual PFCs. Numerical serum PFNA data from these studies has been requested from the sponsors of these studies but has not been provided to date.

Of the numerous effects observed in Das et al. (2015), increased maternal liver weight was selected as the critical endpoint for quantitative risk assessment because serum levels and liver weights were both measured at the same time point (GD 17), one day after the last dose. Liver weight increased in a dose related manner, with a LOAEL of 1 mg/kg/day and no NOAEL was identified.

Dose-response modeling of endpoints of developmental toxicity assessed in the offspring in Das et al. (2015), based on maternal serum levels measured on GD 17, gave similar results to those obtained for maternal liver weight. These endpoints were not used as the basis for quantitative dose response modeling of maternal serum levels because of greater uncertainty about the relationship of maternal serum levels on GD 17 to those effects that were assessed in offspring at later time-points.

Serum levels of PFNA measured in the pups were not used in dose-response modeling of the pup developmental endpoints because they were measured after maternal dosing ended and/or at different time points than when endpoints were assessed in the pups. Thus, these serum levels in the pups may not be indicative of the serum levels which caused the observed effects. It is notable that decreased body weights in male offspring persisted until at least 287 days of age, a time point at which almost all PFNA had been eliminated from the body.

PFNA caused similar effects at similar or lower doses in a study in male mice (Wang et al.,

2014b) and a second developmental study in another strain of mice (Wolf et al., 2010). PFNA also caused several other types of toxicity in other studies at similar or lower doses and/or estimated serum levels than those (>1 mg/kg/day) causing increased maternal liver weight in Das et al. (2015). These studies are discussed in detail above, and include increased liver weight at 0.45 mg/kg/day in mice dosed for 21 days (Kennedy, 1987); increased serum glucose and other effects at 1 mg/kg/day, and related biochemical effects at 0.2 mg/kg/day, in mice dosed for 14 days (Fang et al., 2012a); immunotoxicity at 1 mg/kg/day in mice dosed for 14 days (Fang et al., 2008); and damage to testicular Sertoli cells and other related effects at 1 mg/kg/day in rats dosed for 14 days. Additionally Stump et al. (2008) and Mertens et al. (2010) discuss an unpublished study (Wolterbeek, 2004) in which serum cholesterol, calcium, and phospholipids were decreased in male mice dosed with 0.1 mg/kg/day Surflon S-111, a PFC mixture containing primarily PFNA, for 14 days. Histopathological effects in the liver, including necrosis, occurred in male mice dosed with Surflon S-111 at 0.025 mg/kg/day for 18 or 21 weeks, a dose at which hepatic enlargement did not occur (Stump et al. 2010). The results of these other studies, as well as the other effects in Das et al. (2015), provide further qualitative support to the dose and serum level chosen as the basis for quantitative risk assessment.

#### Determination of Point of Departure (POD)

Benchmark dose (BMD) modeling is a quantitative approach commonly used to estimate a generalizable NOAEL that does not directly depend on the specific doses/exposures in a given study. In this context, it is used to predict the dose (BMD) and its lower 95% confidence limit (BMDL) corresponding to a minimal response level (the BMR) that is consistent with the observed data. USEPA Benchmark Dose Modeling Software 2.40 (USEPA, 2014a) was used to perform BMD modeling of the data on liver weight on GD 17 in pregnant mice (20-25 per dose group) exposed to PFNA on GD 1-17 (Das et al., 2015).

The data that are presented graphically in Das et al. (2015), as well as Lau et al. (2009), were obtained in numerical form from the investigator, C. Lau. Average serum levels in the pregnant mice on GD 17 in the 0, 1, 3, and 5 mg/kg/day groups were 15 ng/ml, 13,700 ng/ml, 21,800 ng/ml, and 79,500 ng/ml, respectively. Average liver weights in the 0, 1, 3, and 5 mg/kg/day groups on GD 17 were 2.24, 3.29, 4.36, and 5.26 g. BMD and the BMDL serum levels were determined for a 10% increase from the mean liver weight in the pregnant control mice. Of the models that gave an acceptable fit to the data, the BMDL was derived from the Hill model based on the overall fit of that model using the statistical criteria incorporated in the BMDS software. The BMDL for this model, 5,200 ng/ml (5.2 µg/ml), was selected as the POD (Appendix 4).

Because the half-life of PFNA in female mouse serum is 34-69 days, the serum concentration of PFNA following the 17 days of dosing represents the maximum serum concentration during the dosing period, and the average exposure over this period was lower than the exposure at the end of the dosing period. Thus, attributing the liver weight effect to the serum concentration on day 17 is a non-conservative approach as the effect could have resulted from a lower exposure experienced at an earlier time during the dosing period.

For comparison, BMD and BMDL values were also derived for pup endpoints (relative liver weight and body weight at PND 1 and PND 24; day of eye opening, preputial separation, and

vaginal opening) from Das et al. (2015), based on maternal serum level on GD 17. BMD and BMDL values for these other endpoints were similar to that obtained for maternal liver weight. The BMD and BMDL values and supporting data for maternal liver weight and the additional endpoints are presented in Appendix 4. Detailed information on the benchmark dose modeling for a 10% increase in maternal liver weight on GD 17 from Das et al., (2015) using the Hill Model is presented in Appendix 5.

#### Derivation of health-based water concentration

# Application of uncertainty factors

The choice of uncertainty factors is consistent with current USEPA IRIS guidance (USEPA, 2012c) and previous risk assessments developed by NJDEP and the DWQI.

Uncertainty factors (UFs) are applied to the POD serum level of 5.2 ug/ml (5200 ng/ml) derived above to obtain the target human serum level. The target human serum level (ng/ml serum) is analogous to a Reference Dose (RfD) but is expressed in terms of internal, rather than administered, dose.

The total uncertainty factor applied to the POD serum level is 1000, and includes the following uncertainty factors:

- 10 Human variation, to account for variation in susceptibility across the human population and the possibility that the available data may not be representative of individuals who are most sensitive to the effect.
- 3 Animal-to-human extrapolation, to account for toxicodynamic differences between humans and mice.

The typical uncertainty factor of 3 for toxicokinetic variability between species is not included because the risk assessment is based on comparison of internal dose (serum levels) rather than administered dose.

#### 10 – Duration of exposure

The POD is based on a systemic effect (increased liver weight) resulting from exposure for only 17 days, while the value derived is intended to protect for chronic exposure. Other studies discussed above suggest that PFNA causes additional and/or more severe effects as exposure duration increases.

#### 3 – Incomplete database

Gaps in the toxicology database for PFNA include the lack of developmental neurobehavioral studies, the absence of chronic/carcinogenicity studies, and lack of two-generation study in an appropriate species, as well as the lack of studies of specific developmental effects such as mammary gland development that are affected by low doses of the closely related compound, PFOA. Additionally, the results of Stump et al. (2008) suggest that PFNA causes liver necrosis at doses below those that cause increased liver weight, the endpoint used as the basis for the risk assessment.

The target human serum level is:  $\frac{5,200 \text{ ng/ml}}{1000} = 5.2 \text{ ng/ml}.$ 

## Relative Source Contribution factor

A Relative Source Contribution (RSC) factor that accounts for non-drinking water sources including food, soil, air, water, and consumer products is used in the development of health-based drinking water concentrations based on non-carcinogenic effects. This approach is used by the DWQI for Health-based MCLs, by USEPA for Maximum Contaminant Level Goals, and by other states in development of similar health-based drinking water values. An RSC is intended to prevent total exposure from all sources from exceeding RfD (USEPA, 2000). When sufficient chemical-specific information on non-drinking water exposures are not available, a default RSC of 0.2 is used, meaning that 20% of the RfD may come from drinking water (USEPA, 2000). When sufficient chemical-specific exposure data are available, a chemical-specific RSC may be derived, with floor and ceiling RSC values of 20% and 80% (USEPA, 2000).

In the most recent NHANES data from 2011-12, the geometric mean serum PFNA concentration was 0.88 ng/ml and the 95<sup>th</sup> percentile value was 2.54 ng/ml (CDC, 2015). PFNA serum levels in NHANES reflect background exposures to PFNA and PFNA precursors at levels prevalent throughout the U.S. from media such as food, water, air, dust, and consumer products. Based on the infrequent occurrence of PFNA reported in U.S. public drinking water supplies in UCMR3 and other studies (discussed above), it is unlikely that the mean and median PFNA serum levels in the U.S. general population reported by NHANES are influenced by drinking water exposures.

In N.J. communities where drinking water is contaminated with PFNA from past industrial releases, PFNA exposure from non-drinking water sources could also be higher than in other U.S. locations due to contamination of other environmental media. Because PFNA is known to bioaccumulate in fish, the possibility of elevated exposures from recreationally caught fish is of particular concern in areas with past industrial release of PFNA. In 2004-2007, elevated levels of PFNA, as well as C11, were found in fillets from white perch and channel catfish from locations on the Delaware River in the vicinity of communities where drinking water is contaminated with PFNA (DRBC, 2009). However information provided by the Delaware River Basin shows that PFNA was not detected in fillets of these species from the same Delaware River locations in more recent sampling performed in 2010 and 2012.

Because the most recent data do not suggest elevated exposures from recreationally caught fish in communities where PFNA is present in drinking water, the 95<sup>th</sup> percentile PFNA serum level of 2.54 ng/mL (Table 2) is assumed to represent a reasonable and protective estimate of total non-drinking water exposure. It was considered appropriate to use this 95<sup>th</sup> percentile serum value to develop a chemical-specific RSC for PFNA. The RSC for PFNA is developed using the "subtraction" approach described by USEPA (2000), but on the basis of serum levels rather than administered dose.

The chemical specific RSC (%) for PFNA is developed by subtracting the NHANES (2011-12) 95<sup>th</sup> percentile PFNA serum level from the target human serum level for PFNA (above) of 5.2 ng/L, and dividing by the target human serum level.

 $RSC = \underline{Target\ human\ serum\ level} - 95^{th}\ \frac{\%\ NHANES\ serum\ level}{\text{NHANES}}\ x\ 100$   $Target\ human\ serum\ level$ 

PFNA RSC = 
$$5.2 \text{ ng/ml} - 2.54 \text{ ng/ml} \times 100 = 51.2\%$$
 (rounded to 50%)  
5.2 ng/ml

Based on the above, the increase in human serum level that can result from <u>drinking water</u> exposure only is:

5.2 ng/ml x 0.5 = 2.6 ng/ml (2600 ng/L).

#### Development of Health-based MCL

Development of the Health-based MCL for PFNA is based on the same general approach used to develop the New Jersey health-based drinking water guidance for PFOA. This approach is described in NJDEP (2007) and Post et al. (2009a) and is applicable to other persistent PFCs found in drinking water.

Because the half-life of long-chain PFCs such as PFNA is much longer in humans (several years) than in rats and mice, a given administered dose (mg/kg/day) results in a much greater internal dose (as indicated by serum level) in humans than in these animal species. Therefore, comparisons between effect levels in animal studies and human exposures were made on the basis of serum levels rather than administered dose.

As discussed above, ongoing exposure to PFOA in drinking water increases PFOA serum levels, on average, in a serum:drinking water ratio of at least 100:1 with several studies indicating mean ratios substantially above 100:1. The 100:1 ratio for PFOA used in development of the PFOA drinking water guidance is based on data from adults and is higher in children.

The half-life of PFNA is estimated as 2 to 30 times longer than that of PFOA in rats and mice, and limited human data indicate that its human half-life is at least twice as long as for PFOA (with the exception of the more uncertain data from women of childbearing age; Tables 3 and 4). These data on the relative half-lives of PFOA and PFNA indicate that use of a ratio of 200:1 is not overly stringent. Although upper percentile values for exposure parameters are typically used by USEPA and DWQI for drinking water risk assessment (USEPA, 2014b), the 200:1 ratio is intended to represent a central tendency estimate rather than an upper percentile value.

Based on the 200:1 ratio between PFNA serum levels and drinking water concentration derived above, an increase in PFNA serum level of 2600 ng/L is expected to result from ongoing exposure to 13 ng/L PFNA in drinking water. Therefore, the Health-based MCL for PFNA is calculated as 13 ng/L or  $0.013 \,\mu\text{g/L}$ .

#### DISCUSSION OF UNCERTAINTIES

• Ongoing exposure to PFNA at 13 ng/L (0.013 μg/L) in drinking water is estimated to contribute an additional 2.6 ng/ml, on average, to the PFNA concentration in blood serum already present in the general population based on a serum:drinking water ratio of 200:1. Thus,

the average serum level in communities with drinking water at 13 ng/L (0.013  $\mu$ g/L) is estimated at about 3.48 ng/ml, by adding the contribution to serum from drinking water (2.6 ng/ml) to the geometric median (0.88 ng/ml) serum level in the general U.S. population. This represents a 4-fold increase from the general population geometric median. In infants and children, the increase in serum levels from ongoing exposure to PFNA in drinking water would likely be greater than in adults, due to their greater water consumption on a body weight basis.

Although the epidemiological data on PFNA are limited, several epidemiological studies have found associations of PFNA serum levels in the general population with potentially important health endpoints. Causality cannot be established for these effects because of the cross-sectional design of the studies and because, in some studies, the associations cannot be definitively attributed to PFNA because of correlations with other PFCs. However, these data contribute to the overall body of evidence about the potential hazard of PFNA. Thus, there is uncertainty about the extent of protection provided by a Health-based MCL that will result in serum PFNA levels above the general population range.

- Communities with elevated exposures to PFNA from drinking water or other environmental media have not been studied. The sole study of workers with occupational exposure is of limited utility, in part because PFNA serum levels were not reported.
- Several important health endpoints that have been linked to PFOA in studies of populations with drinking water exposure, including cancer, have not been evaluated in humans exposed to PFNA.
- An unpublished 14 day study of Surflon S-111 (Wolterbeek, 2004; cited in Mertens et al., 2010, and Stump et al., 2008) found decreased serum cholesterol, phospholipids, and calcium in male rats at 0.1 mg/kg/day. Cholesterol and calcium were not affected at higher doses of Surflon S-111 in the 90 day rat subchronic study and phospholipids were not measured. These unpublished results raise uncertainties about the potential for Surflon S-111 and PFNA to cause these effects in rats, as well as uncertainty about other effects in the unpublished study that may have been discussed by Stump et al. (2008) and Mertens et al. (2010).
- Histopathological changes in the liver, including necrosis, occurred in F<sub>0</sub> and F<sub>1</sub> males in the two-generation rat study (Stump et al., 2008) at a dose (Surflon S-111, 0.025 mg/kg/day; PFNA, 0.019 mg/kg/day) below the doses that caused increased liver weight in the same study. Thus, histopathological changes, including necrosis, were a more sensitive endpoint than increased liver weight in this rat study. No NOAEL was identified for these histopathological effects in liver in the two-generation rat study, and the LOAEL in male rats was 0.025 mg/kg/day Surflon S-111 (0.019 mg/kg/day PFNA). It is important to note that the histopathological changes in the liver reported by Stump et al. (2008), and Mertens et al. (2010) are not of the same nature as are those associated with PPAR-alpha activation (peroxisome proliferation and increased smooth endoplasmic reticulum), suggesting that PFNA causes liver toxicity independent of PPAR-alpha mediated effects.

In part because numerical serum level data are not available, this study and endpoint cannot be

used for quantitative risk assessment. Available graphical information from this study and the accompanying study (Mertens et al., 2010) suggests that the serum PFNA level in males at 0.025 mg/kg/day was well below the serum PFNA level at the lowest dose (1 mg/kg/day) in the Das et al. (2015) mouse developmental study used as the basis for quantitative risk assessment. However, histopathological changes in the maternal and pup liver were not evaluated by Das et al. (2015), and it is not known if these effects occurred in this study. Quantitative risk assessment based on liver histopathology could result in a significantly lower BMDL than the one based on Das et al. (2015).

- No chronic toxicology studies of cancer or other effects that may occur after longer exposures and/or in old age have been conducted. PFOA and PFOS, the only two PFCs for which chronic studies have been conducted, caused tumors in rats. Results of the subchronic (Mertens et al., 2010) and the two-generation (Stump et al., 2008) suggest that additional and/or more severe effects may occur as exposure duration increases.
- It is not known whether PFNA causes some effects seen in mice exposed to low doses of PFOA and/or other PFCs. PFOA causes specific developmental effects in mice at low doses (0.01 mg/kg/day) and serum levels, including delayed mammary gland development (reviewed in Post et al., 2012; Tucker et al., 2014). The serum level BMDLs for PFOA based on delayed mammary gland development endpoints in mice are 23-25 ng/ml (Post et al., 2012), more than two orders of magnitude lower than the BMDL for PFNA of 5300 ng/L based on maternal liver weight gain. Additionally, neonatal mice exposed to a single dose of <1 mg/kg of other persistent PFCs (PFOA, PFOS, PFHxS) exhibited permanent neurobehavioral effects accompanied by changes in critical brain proteins. These endpoints have not been evaluated for PFNA, which is closely related to PFOA and has a generally similar profile of toxicological effects.
- The subchronic (Mertens et al., 2010) and two-generation (Stump et al., 2008) rat studies used a mixture of PFCs with PFNA as the primary component. These are the only toxicology studies of PFNA with exposure durations greater than 21 days. As discussed above, the data suggest that PFNA was primarily responsible for the effects observed in these studies. Nonetheless, there is uncertainty about the contribution of the other PFCs that are minor components of the mixture to the effects that were observed.
- There is uncertainty about the serum:drinking water ratio of 200:1 for PFNA. Although this ratio is reasonable and not overly stringent, based on the available toxicokinetic data from animals and humans, human information on the half-life of PFNA is limited, and serum levels have not been measured in communities exposed to PFNA in drinking water. Although upper percentile exposure assumptions are typically used in risk assessment, these values are intended to represent central tendency estimates, rather than upper percentile values.
- Uncertainties about the human relevance of effects seen in animals are inherent to all risk assessments based on animal data. The available information indicates that the effects of PFNA observed in experimental animals can be assumed to be relevant to humans for the purposes of risk assessment.

 Available information indicates that the target organs and modes of action are generally similar for PFNA and other PFCs, particularly PFOA. Therefore, the toxicity of PFNA and other PFCs may be additive. Although PFNA and other PFCs, including PFOA, are known to co-occur in some NJ public water supplies, the potential for additive toxicity of PFNA and other PFCs was not considered in development of the Health-based MCL.

## HEALTH-BASED MCL RECOMMENDATION

The recommended Health-based MCL for PFNA is 13 ng/L or 0.013  $\mu$ g/L.

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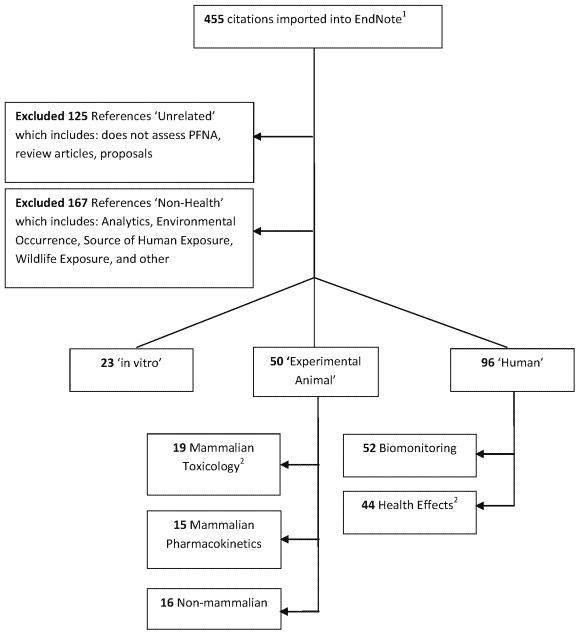
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## **APPENDIX 1. Literature Search Criteria and Documentation**

- 435 citations from PubMed (November 5, 2014): search "375-95-1"[EC/RN Number] OR "4149-60-4"[EC/RN Number] OR perfluorononanonic OR (perfluoro AND nonanoic) OR perfluorononanoate OR (perfluoro AND nonanoate) OR S-111-S-WB"; Limits: none
- 20 citations from Toxline (November 6, 2014) removed 7 duplicates: search "375-95-1"[EC/RN Number] OR "4149-60-4"[EC/RN Number] OR perfluorononanonic OR (perfluoro AND nonanoic) OR perfluorononanoate OR (perfluoro AND nonanoate) OR S-111-S-WB"; Limits: Include PubMed records = no
- 7 citations identified from backward search



<sup>&</sup>lt;sup>1</sup>Totals may exceed number of imported files if articles are placed into more than one category

Researchers evaluated full text of each article to determine whether mammalian toxicology or human health effects were investigated in studies. All studies determined to be evaluating in vivo mammalian toxicology and human health effects are cited in the final report and other studies are cited as appropriate.

# APPENDIX 2. Individual Study Tables for Epidemiologic Study of Human Health Effects and PFNA

Reference and Study Design	Exposure Measures	Results	Comment
Bloom et al., 2010	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Linear regression, covariates and confounders	Cross-sectional design prevents causal
Study Design:		considered included age, gender, BMI,	inference.
Cross-sectional	Population-Level Exposure:	smoking, goiter or thyroid condition,	
	Geometric mean of PFNA 0.79	race/ethnicity, use of thyroid medication, and	Small sample size limited ability to
Location:	ng/mL (95% CI 0.68, 0.96)	self-reported consumption of sportfish caught	control for potential covariates and
New York, United States		from NY waters	confounders simultaneously, or other
			potential environmental compounds of
Population:		PFCs and TSH were log transformed.	interest or other PFCs.
Subgroup of 31 of 38			
participants from Licensed New		Outcome: ln-TSH (µIU/mL)	
York State sportfish anglers and		Major Findings:	
their partners (NYSACS)		β=0.09 (95% CI -0.60, 0.78)	
[n=18,082] who completed a			
Dioxin Exposure Substudy		Outcome: free T4 (fg/dL)	
component, age 31 to 45 years.		Major Findings:	
		β=0.04 (95% CI -0.07, 0.15)	
Outcome Definition:			
Questionnaire and a blood			
sample			
_			

Reference and Study Design	Exposure Measures	Results	Comment
Braun et al., 2014	Exposure Assessment:	Stat Method:	Major Limitations:
	Maternal serum @ 16-26 weeks of	Bayesian models were used and covariates and	Modest sample size may have resulted in
Study Design: Prospective	pregnancy	confounders considered include: maternal age	failure to detect associations.
birth cohort		at delivery, race, marital status, education,	
	Population-Level Exposure:	parity, insurance status, employment, and	Possible confounding due to unmeasured
Location: Cincinnati, OH	PFNA median is 0.9 ng/ml.	household income, and prenatal vitamin use,	variables and other environmental
		depressive symptoms during the second	contaminants, including other PFCs.
<b>Population:</b> Pregnant women		trimester, maternal full-scale IQ. Also used to	
in the Health Outcomes and		two-stage Bayesian models to control for co-	
Measures of the Environment		pollutants.	
(HOME). Final study size			
included 175 mother-child		Exposures were log-transformed	
pairs.			
		Outcome: SRS total scores	
Outcome Definition: Autistic		Major Findings:	
behaviors measured as mother		Negligible changes in SRS scores	
completed Social			
Responsiveness Scale (SRS) at		*note PFOA- found a protective association	
4 and 5 years of age of child.			
Higher scores indicate more			
autistic behaviors.			

Reference and Study Design	Exposure Measures	Results	Comment
Buck Louis et al., 2014	Exposure Assessment:	Stat Method: Linear regression, covariates	Comment:
	Serum concentrations	and confounders assessed include age, BMI,	PFNA serum concentrations are relatively
Study Design:		smoking, abstinence time, sample age (hours),	different between mean from Michigan
Cross-sectional	Population-Level Exposure:	and study site	and Texas (possibly explainable by the
	Median (IQR):		different recruitment techniques in each
Location:	Michigan=1.0 (0.75, 1.35)	PFCs were natural log transformed	state). Importantly analyses were not
Population from 16 counties in	Texas=1.65 (1.2, 2.2)		stratified by recruitment location other
Michigan and Texas		Outcome: Volume, straw distance, sperm	exposure ranges differed.
		concentration, total count, hypo-osmotic	
Population:		swollen, 8 motility measures, 6 sperm head	Major Limitations:
501 males partners of couples		measures, 12 individual and 2 summary	Lack of well-established norms for many
planning pregnancy		morphology measures, 2 sperm chromatin	individual parameters and a reliance on
		stability measures	next day semen analysis and possible
Outcome Definition:		Major Findings: Only 'Morphology – Strict	spurious associations.
35 semen quality endpoints		Criteria (%)' was statistically associated with	
using baseline serum sample		PFNA [ $\beta$ =3.897 (95% CI 0.564, 7.231)]. The	Absence of any reproductive hormone
and follow-up one month later		other 34 parameters were not statistically	measurements.
(used for sensitivity analysis)		significant associated with PFNA.	
			Possible confounding due to unmeasured
			variables.
			Cross-sectional design prevents causal
			inference.

# DRAFT DRAFT DRAFT

Reference and Study Design	<b>Exposure Measures</b>	Results	Comment
Chen et al., 2012	Exposure Assessment:	Stat Method:	Major Limitations:
Study Design:	Cord blood collected at delivery	Linear regression, covariates and confounders considered included maternal age at	The sample size was not large enough to form conclusions on the impacts of PFCs
Prospective birth cohort	Population-Level Exposure:	conception, prepregnancy BMI, educational	on birth outcomes with low prevalence
1 Tospective offth conort	Geometric mean cord blood	level, In-cord blood cotinine level, type of	rates (e.g. low birth weight or small for
Location:	plasma PFNA 2.36 ng/mL (4.74 –	delivery, infant sex, and parity	gestational age).
Taiwan	geometric standard deviation)	don't ory, maint son, and party	gestational age).
	Section 2 standard deviations,	PFNA natural log transformed. Coefficients	A lack of information concerning
Population:		from most adjusted models shown below.	maternal diet habits could limit
Study subjects from the Taiwan			exploration of exposure sources.
Birth Panel Study (TBPS),		Outcome: Gestation age (weeks)	
2004-2005. Final study size 429		Major Findings:	
mother-infant pairs		β=0.04 (95% CI -0.06, 0.14)	
Outcome Definition:		Outcome: Birth weight (grams)	
Mother interviews and medical		Major Findings:	
record extraction		β=6.07 (95% CI -16.6, 28.7)	
		Outcomes Birth langth (continuators)	
		Outcome: Birth length (centimeters)	
		Major Findings:	
		β=0.16 (95% CI 0.05, 0.27)	
		Outcome: Head circumference (cm)	
		Major Findings:	
		β=0.05 (95% CI -0.04, 0.13)	
		, , , , , , , , , , , , , , , , , , , ,	
		Outcome: Ponderal index(gm/cm <sup>3</sup> )	
		Major Findings:	
		β=-0.02 (95% CI -0.03, -0.004)	
		Outcome: Preterm birth (weeks)	
		Major Findings:	
		OR=0.88 (95% CI 0.71, 1.11)	
		Outcome: Low birth weight (kg)	
		Major Findings:	
		OR=0.76 (95% CI 0.47, 1.23)	
		OR 0.70 (5570 OF 0.77, 1.23)	
		Outcome: Small for gestational age	
		Major Findings:	
		OR=0.97 (95% CI 0.74, 1.26)	

Reference and Study Design	Exposure Measures		<b>1</b>	Results	Comment
Christensen et al., 2011	Exposure Assessment:			Stat Method:	Major Limitations:
	Maternal serum samples taken at			Logistic regression, covariates and	Included a single measure of PFC
Study Design:	delivery			confounders considered include mother pre-	exposure, lack of complete information on
Nested Case-control				pregnancy BMI, mother's age at delivery,	age of menarche for controls, and some
	Population-Level Exposure:			mother's age at menarche, mother's	missing information on covariates.
Location:		Modion	QR	educational level, mother's social class, child's	
Avon, United Kingdom	CACO	212000000	QIC	ethnic background, child's birth order.	Participants may not be representative of
		(ng/mL)	7.00		cohort. Parents of non-respondents tended
Population:	Case	<b></b>	5-0.8	PFCs were natural log transformed. PFC	to be of a lower educational attainment,
448 girls born in 1991-1992	Control		5-0.8	treated continuously and dichotomized (above	social class, more likely to be under the
from mothers enrolled in a	Total	0.6 0.	5-0.8	v. below median case serum concentration).	age of 25, and non-white race/ethnicity.
prospective cohort. Cases, girls				Estimates from adjusted models presented	
reporting menarche before age				here.	Did not control other unmeasured
11.5 years of age n=218, and					environmental pollutants, including other
control girls reporting menarche				Outcome: Age at menarche (years)	PFCs.
at 11.5 years or after n=230.				Major Findings:	
				Continuous: OR=0.91 (95% CI 0.59,1.40)	
<b>Outcome Definition:</b>				Binary: OR=1.15 (95% CI 0.78,1.69)	
Follow-up responses					

Reference and Study Design	Exposure Measures	Results	Comment
Dong et al., 2013	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	PFCs categorized using Wilcoxon rank-sum	Estimates may also be influenced by
Study Design:		test.	selection bias or uncontrolled
Case-control			confounding.
	Population-Level Exposure:	Logistic regression, confounders and	
Location:	Median PFNA serum	covariates considered include parental	Did not control for other co-occurring
Taiwan	concentration for cases was 1.0	education, body mass index, environmental	environmental contaminants including
	ng/mL and for controls was 0.8	tobacco smoke, and month of survey. Linear	PFCs or other possibly important
Population:	ng/mL	regression used to explore continuous	confounders.
Children (10-15 years of age),		outcomes.	
2009-2010			
Asthmatic n=231		Results shown here for most adjusted model.	
Non-asthmatic n=225			
		Outcome: Asthma	
<b>Outcome Definition:</b>		<b>Major Findings:</b> ↑ (P for trend <0.001)	
Asthma and immunological			
markers (absolute eosinophil		No trend looking as asthma severity	
count (AEC), IgE, eosinophilic			
cationic protein (ECP))		Outcome: IgE (IU/mL)	
•		Major Findings:	
		w/o asthma: NS (P for trend 0.084)	
		w/ asthma: ↑ from lowest quartile (p for trend	
		0.001)	
		Outcome: AEC (x 10 <sup>6</sup> /L)	
		Major Findings:	
		w/o asthma: NS (P for trend 0.086)	
		w/ asthma: $\uparrow$ (P for trend <0.001)	
		Outcome: ECP (µg/L)	
		Major Findings:	
		w/o asthma: NS (P for trend 0.167)	
		w/ asthma: \(\gamma\) (P for trend 0.003)	

Reference and Study Design	Expos	ure Measures	Results	Comment
Fu et al., 2014	Exposure Assessment:		Stat Method: Linear regression, exposure	Major Limitations:
	Serum concer	ntrations	modeled in quartiles with 1 <sup>st</sup> quartile serving as	Did not take into account cholesterol-
Study Design:			referent group. Binary logistic regression of	lowering medications or other
Cross-sectional	Population-L	Level Exposure:	abnormal lipids by PFC quartile. Covariates	environmental factors and contaminants
	Median PFN	A serum level = $0.37$	and confounders considered include age,	including other co-occurring PFCs.
Location:	(0.02-4.18) ng	g/mL	gender, and BMI were control.	
Henan, China				Cross-sectional design prevents causal
			Outcomes are based on a change in values.	inference
Population:	0 411	Mean		
133 participants, aged 0-88	Quartile	(ng/mL)	Outcome: In-Total cholesterol (TC) (mmol/L)	
years, randomly selected from	1	0.14	Major Findings: ↑ (p-value for trend 0.002)	
people going for health check-	2	0.30		
up at Red Cross Hospital	3	0.45	Outcome: ln-triglycerides (mmol/L)	
	4	1.02	Major Findings: NS (p for trend 0.460)	
Outcome Definition: Total				
cholesterol (TC), triglycerides,			Outcome: high-density lipoprotein cholesterol	
high-density lipoprotein	Median (ng/m	nl)_	(HDLC) (mmol/L)	
cholesterol (HDLC), and LDLC	PFOS=1.47	)	Major Findings: NS (p for trend 0.191)	
	PFOA=1.43			
	11011 1.13		Outcome: ln-LDLC (mmol/L)	
			Major Findings: ↑ ( p for trend 0.004)	
			,	

Reference and Study Design	Expos	ure Measures	Results	Comment
Gallo et al., 2013	Exposure Assessment:		Stat Method:	Major Limitations:
	Serum concer	ntrations	Logistic regression, covariates and	Cross-sectional design prevents causal
Study Design:			confounders considered include age, race,	inference.
Cross-sectional	Population-I	Level Exposure:	gender and educational level, average	
			household income, physical activity, alcohol	Reverse causality
Location:			consumption, smoking, BMI, and diabetes	
United States – Ohio and West				Possible confounding due to unmeasured
Virginia	Ominatila	Range	PFNA was log-transformed, estimates are	variables and other environmental
	Quintile	(ng/mL)	based on a doubling of PFNA	contaminants, including other PFCs.
Population:	1	0.25-0.90		
Adults (age +50 years) who	2	1.0-1.2	<b>Outcome:</b> Memory impairment (Age +65)	Outcome definition depends on self-report
consumed water (for at least 1	3	1.3-1.4	Major Findings:	
year) from a water district with	4	1.5-1.9	Q2 v. Q1, OR=0.86 (95% CI 0.78, 0.96)	
known PFOA contamination,	5	2.0-28.6	Q3 v. Q1, OR=0.87 (95% CI 0.77, 0.98)	
n=21,024 were included in the			Q4 v. Q1, OR=0.86 (95% CI 0.77, 0.95)	
analysis.			Q5 v. Q1, OR=0.89 (95% CI 0.80, 0.99)	
Outcome Definition:			Trend – 0.053	
Self-reported memory			Ordinal regression – 0.97 (95% CI 0.94,1.01)	
impairment				

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Reference and Study Design	Exposure Measures	Results	Comment
Gleason et al., 2015	Exposure Assessment:	Stat Method: Linear regression, covariates	Major Limitations:
	Serum concentrations	and confounders considered include age,	Cross-sectional design prevents causal
Study Design:		gender, race/ethnicity, BMI, poverty, smoking,	inference.
Cross-sectional	Population-Level Exposure:	and alcohol consumption and serum creatinine	
	Median PFNA 1.40 ng/mL	for uric acid. PFNA was natural log	Possible confounding due to unmeasured
Location:		transformed for linear regression. Logistic	variables and other environmental
General U.S. Population		regression was also performed by dividing	contaminants, including other PFCs
•		PFNA into quartiles (no transformations).	
Population:		,	
NHANES 2007-2010, n=4,333		Results are presented for models with most	
individuals, aged >12 years		adjustment	
		ww.gas.v==v==v	
<b>Outcome Definition:</b>		Outcome: Uric acid (mg/dL)	
Liver function biomarkers and		Major Findings:	
uric acid		(linear)-β=0.185 (95% CI 0.091, 0.280)	
ario dela		(logistic)- p-value=0.052	
		(logistic) p villae 0.032	
		Outcome: ALT (µg/L)	
		" U	
		Major Findings:	
		(linear)- β=0.043 (95% CI 0.019, 0.067)	
		(logistic)- p-value=0.042	
		Outcome: GGT (µg/L)	
		Major Findings:	
		(linear)- β=0.050 (95% CI 0.017, 0.083)	
		(logistic)- p-value=0.126	
		(logistic)- p-value-0.120	
		Outcome: AST (µg/L)	
		Major Findings:	
		(linear)-β=0.013 (95% CI -0.005, 0.031)	
		(logistic)- p-value=0.516	
		(logistic)- p-value=0.316	
		Outcome: ALP (µg/L)	
		Major Findings:	
		(linear)-β=-0.009 (95% CI -0.034, 0.016)	
		(logistic)- p=value=0.097	
		(105istic)- p value 0.077	
		Outcome: total bilirubin (mg/dL)	
		Major Findings:	
		(linear)-β=0.009 (95% CI -0.017, 0.034)	
		(logistic)- p-value=0.614	
		(logistic)- p-value-0.014	

Reference and Study Design	Exposure Measures	Results	Comment
Granum et al., 2013	Exposure Assessment:	Stat Method:	Other studies that found associations with
	Maternal serum concentrations	Poisson regression used for health outcomes	PFCs and decreased vaccine response in
Study Design:	collected at time of delivery	using count data.	children (Grandjean et al., 2012) and
Prospective birth-cohort			adults (Looker et al., 2013) did not
		Confounders and covariates considered include	evaluate PFNA.
Location:	Population-Level Exposure:	maternal allergy, paternal allergy, maternal	
Norway	The median PFNA serum	education, child's gender, and/or age at 3-year	
	concentration (n=99, 0.3 ng/mL)	follow-up	Major Limitations:
Population:			Selection bias due to the low recruitment
BraMat Cohort established		PFCs categorized into quartiles.	rate.
2007-2008 (recruited from the			
Norwegian Mother and Child		Outcome: Rubella vaccine immune response	Small study population.
(MoBa) Cohort)		(OD – optical density)	
Children (n=99)		Major Findings:	Multiple exposure-health outcome
		β=-1.38 (95% CI -2.35, -0.40) (p-value	comparisons.
Outcome Definition:		0.007)	
Outcomes from blood samples			Did not control for other co-occurring
from the children at 3 years-of-		No significant associations were found	environmental contaminants including
age and questionnaire given at		between the PFNA concentration and other	PFCs or other possibly important
child age 1, 2, and 3 years		vaccine antibody levels (Measles, Tetanus,	confounders.
		Haemophiluz influenza (Hib)).	
Serological outcomes: antibody			
levels specific for four vaccines		Outcome: Common Cold	
(measles, rubella, tetanus, and		Major Findings:	
Hib), using allergen-specific		(No. of episodes)	
IgE. Clinical outcomes: from		$3^{rd}$ year $\beta$ =1.24 (95% CI 0.08, 2.40)	
questionnaire include data		All years β=0.57(95% CI -0.10, 1.23)	
about infectious diseases,		(Dichotomous)	
allergy, and asthma		3 <sup>rd</sup> year OR=0.11 (95% CI 0.001-22.5)	
		Outcome: Gastroenteritis	
		Major Findings:	
		No. of episodes:	
		$3^{rd}$ year β=-0.46 (95% CI -2.27,1.35)	
		All years $\beta$ =-0.10 (95% CI -1.36,1.17)	
		70.1	
		Dichotomous:	
		3 <sup>rd</sup> year OR=0.16 (95% CI 0.001,17.5)	
		All years OR=0.06 (95% CI 0.00,171)	

Reference and Study Design	Exposure Measures	Results	Comment
Gump et al., 2011	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Covariates and confounders considered	Cross-sectional design prevents causal
Study Design:		included child's, mother's, and father's age,	inference.
Cross-sectional	Population-Level Exposure:	family income, parent's education, parent's	
	The mean, median, and range of	occupational class, child's, mother's and	Reverse causality
Location:	PFNA were 0.82 ng/mL, 0.72	father's BMI, gender, race, history of chronic	
Oswego County, NY	ng/mL, and 0.10-4.14 ng/mL	illness, blood lead levels, and blood mercury	Possible confounding due to unmeasured
		levels.	variables and other environmental
Population:			contaminants including other PFCs.
Subset of children aged 9-11		PFNA and DRL was natural log transformed.	
recruited from a mailed			The study population was a subset of
invitation (n=83).		Outcome: Median IRTs	participants drawn from a larger study of
		Major Findings: (by each time period)	volunteers and was disproportionately
Outcome Definition:		0-5 min: -0.07 (95% CI -0.029, 0.14)	more male.
Impaired response inhibition		6-10 min: -0.24 (95% CI -0.46, -0.02)	
was measured through		11-15 min: -0.15 (95% CI -0.38, 0.07)	Small sample size possibly limiting ability
performance in a 20 minute		16-20 min: -0.05 (95% CI -0.28, 0.18)	to detect associations.
differential reinforcement of			
low rates (DRL) of responding			
task which requires children to			
learn that they need to wait 20			
seconds before responding.			
Results are evaluated by inter-			
response times (IRT), with			
longer delays indicating better			
performance.			

Reference and Study Design	Exposure Measures	Results	Comment
Halldorsson et al., 2012	Exposure Assessment:	Stat Method:	Major Limitations:
	Prenatal PFC exposure assessed	Linear regression for continuous outcomes and	Losses during follow-up.
Study Design:	by PFCs in maternal serum	log-Poisson regression for dichotomous	
Prospective birth-cohort	samples from gestational week 30	outcomes. All analyses were performed for	Did not take into account other
		males and females separately. Confounders	environmental factors and contaminants.
Location:		and covariates considered include maternal	
Denmark	Population-Level Exposure:	age, maternal education, maternal smoking,	
	The median maternal PFNA serum	parity, prepregnancy BMI, infant birth weight,	
Population:	level was 0.3 ng/mL	offspring age at follow-up.	
Mother-offspring pairs (n=915			
of 965 women), mothers		The main focus of this work was on PFOA	
recruited 1988-1989 and		concentrations and findings for additional	
offspring followed at 20 years		associations with PFNA are not provided.	
of age.			
		Outcome: BMI (kg/m²)	
N=345 for overweight and		Major Findings: In univariate analysis PFNA	
N=252 for other biomarkers of		positively associated with female offspring	
adiposity		BMI at age 20 (p for trend $< 0.05$ ). However,	
		after adjustment for PFOA, the regression	
*Age is not clearly stated.		coefficients became nonsignificant.	
Outcome definition:			
Anthropometric measures			

Reference and Study Design	Exposure Measures	Results	Comment
Hardell et al., 2014	<b>Exposure Assessment:</b>	Stat Method:	Major Limitations:
	Serum samples	Wilcoxon rank sum test was used for	Small sample size, limits study power
Study Design:		calculation of p-values for comparisons	
Case-Control	Population-Level Exposure:	between cases and controls.	Did not control for other co-occurring
	Cases median serum PFNA = 0.61		environmental contaminants including
Location:	ng/mL	Unconditional logistic regression; covariates	PFCs or other possibly important
Sweden		and confounders considered age, BMI, year of	confounders.
	Controls median serum	sampling to estimate as odds ratios and 95%	
Population:	PFNA=0.57 ng/mL	CI. The median and 75 percentile	Comments:
Cases of prostate cancer		concentration of PFNA used as cutoff values.	Well performed study.
admitted to hospital 2007-2011,			
n=201		Additionally OR and 95% CI by Gleason score	
Population-based controls		and PSA level and examined interaction of	
(matched on age and		PFNA and relation to heredity.	
geographical area), n=186			
		Outcome: Prostate Cancer	
Outcome definition:		Major Findings:	
Diagnosis of cancer with		Blood concentrations between cases and	
scheduled radiation or		controls were not statistically significantly	
chemotherapy treatment		different (p=0.03)	
		OR=1.2 (95% CI: 0.8, 1.8)	
		Stratified by Gleason Score	
		Low- OR=1.4 (95% CI: 0.8, 2.5)	
		High- OR=1.0 (95% CI: 0.6, 1.6)	
		11.5 (35/4 01. 0.0, 1.0)	
		Stratified by PSA	
		Low- OR=1.1 (95% CI 0.7, 1.8)	
		High- OR=1.2 (95% CI 0.7, 2.1)	
		Interaction with heredity	
		p, interaction=0.92	

Reference and Study Design	Exposure Measures	Results	Comment
Hoffman et al., 2010	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentration	Logistic regression, covariates and	Reliance of parent report of outcome.
Study Design:		confounders considered include age, sex,	
Cross-sectional	Population-Level Exposure:	race/ethnicity, sample cycle, maternal smoking	Possible confounding due to unmeasured
	PFNA median serum	during pregnancy, preschool attendance, NICU	variables, and co-occurring environmental
Location:	concentration 0.6 ng/mL with a	admittance, ETS, lead, PIR, Access to health	contaminants including other PFCs.
General U.S. population	range of non-detect to 5.9 and an	care, health insurance coverage.	
	IQR of 0.5 ng/mL		Cross-sectional design prevents causal
Population:		Effect estimates provided for most adjusted	inference.
NHANES 1999-2000 & 2003-		model at 1 unit increase in serum level.	
2004, children aged 12-15 years			
of age with PFC measurements		Outcome: Attention Deficient /Hyperactivity	
n=571 (48 had ADHD)		Disorder (ADHD)	
		Major Findings:	
<b>Outcome Definition:</b>		Parental report,	
Parental report of medical		OR=1.32 (95% CI 0.86, 2.02)	
diagnosis and/or parental report		w/ prescription use,	
of medication use		OR=1.57 (95% CI 0.67, 3.64)	

Reference and Study Design	Exposure Measur	·es	Results	Comment
Humblet et al., 2014	<b>Exposure Assessment:</b>		Stat Method: Logistic regression; covariates	Major Limitations:
	Serum concentrations		and confounders considered included survey	Cross-sectional design prevents causal
Study Design:			cycle, age, race/ethnicity, sex, poverty,	inference.
Cross-sectional	Population-Level	Exposure:	smoking, health insurance, BMI. Effect	
			modification for sex and race/ethnicity was	Duration of breastfeeding was not
Location:	Groups	Median	explored.	controlled for – a potential confounder.
U.S. population	Groups	(ng/mL)		
	Never asthma	0.8	Untransformed, In-transformed, and tertiles of	
Population:	Ever asthma	0.9	PFNA models are presented for the doubling	
General U.S. population aged	No wheezing	0.8	of PFNA serum concentration	
12-19 years	Wheezing	0.8		
NHANES 1999-2000 & 2003-	No current	0.8	Outcome: Ever asthma	
2008, n=1,877	Current	0.9	Major Findings:	
	L		Ln-linear: OR=0.99 (95% CI 0.88, 1.12)	
Outcome Definition:			Linear: OR=1.05 (95% CI 0.89, 1.23)	
Questionnaire response			T2 v T1: OR=0.95 (95% CI 0.80, 1.12)	
			T3 v T1: OR=0.99 (95% CI 0.84, 1.17)	
			Outcome: Wheezing in past year	
			Major Findings:	
			Ln-linear: OR=0.99 (95% CI 0.84, 1.18)	
			Linear: OR=1.00 (95% CI 0.81, 1.22)	
			T2 v T1: OR=1.08 (95% CI 0.89, 1.32)	
			T3 v T1: OR=0.97 (95% CI 0.75, 1.25)	
			Outcome: Current asthma	
			Major Findings:	
			Ln-linear: OR=1.00 (95% CI 0.76, 1.33)	
			Linear: OR=1.02 (95% CI 0.81, 1.30)	
			T2 v T1: OR=0.90 (95% CI 0.71, 1.14)	
			T3 v T1: OR=1.05 (95% CI 0.82, 1.33)	

Reference and Study Design	Exposure Measures	Results	Comment
Jain, 2013	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Linear regression, covariates and confounders	Did not control other unmeasured
Study Design:		considered included age, gender,	environmental pollutants, including other
Cross-sectional	Population-Level Exposure:	race/ethnicity, smoking, iodine status, C-	PFCs.
	Serum concentrations of PFCs for	reactive protein, BMI, fasting time, and caloric	
Location:	this study population were not	intake.	Cross-sectional design prevents causal
General U.S. population	provided.		inference.
		PFCs and thyroid parameters were log-	
Population:		transformed.	
NHANES 2007-2008, with			
exclusions for pregnancy,		Outcome: TSH (µIU/mL), FT3 (pg/L), FT4	
evidence of thyroid condition,		(fg/dL), thyroglobulin (ng/L), TT3 (fg/dL), and	
and missing data (n=1,733), >		TT4 (pg/dL)	
12 years of age.		Major Findings:	
		PFNA not statistically significantly associated	
Outcome Definition:		with any of the thyroid parameters. (Results	
Laboratory measures		not presented in paper).	

Reference and Study Design	Exposure Measures	Results	Comment
Ji et al., 2012	Exposure Assessment:	Stat Method: Linear regression, confounders	Major Limitations:
	Serum concentrations	and covariates considered include: age, sex,	Did not control other unmeasured
Study Design:		and BMI. PFCs were log-transformed.	environmental pollutants, including other
Cross-sectional	Population-Level Exposure:		PFCs.
	Median serum concentration of	Outcome: log-TT4 (µg/dL)	
Location:	PFNA 2.09 ng/mL (IQR 1.49-	Major Findings:	Cross-sectional design prevents causal
Siheung, Korea	2.74)	β=-0.005 (95% CI -0.034, 0.025)	inference.
Population:	PFOA- 2.74 ng/mL (IQR 2.04-	Outcome: log-TSH (μΙU/mL)	
Recruited from cohort (n=633	3.64)	Major Findings:	
>12 years of age)	PFOS- 7.96 ng/mL (IQR 5.58-	β=0.110 (95% CI -0.035, 0.225)	
	12.10)		
<b>Outcome Definition:</b>			
Thyroid hormones			

Reference and Study Design	Exposure Measures	Results	Comment
Kim et al., 2011	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Correlations between exposure and outcome	Small sample size limited ability to
Study Design:		calculated using Pearson correlation tests	control for potential covariates and
Prospective birth cohort	Population-Level Exposure:	performed using the logarithms of thyroid	confounders simultaneously, or other
-	Median serum concentration of	hormones and PFCs with and with-out	potential environmental compounds of
Location:	PFNA 0.44 ng/mL (IQR 0.23-	adjustment for influential covariates. The	interest.
South Korea	0.39) – pregnant women	following covariate and confounders were	
		considered maternal age, gestational age, and	Possible reverse causality.
Population:	Median cord serum concentration	maternal BMI.	·
Pregnant women recruited from	of PFNA 0.45 (IQR 0.23-0.66) -		Did not control other unmeasured
three hospitals (n=44), mostly	infants	Outcome: T3 (ng/dL), TSH (µIU/mL), TT4	environmental pollutants or other PFCs.
sampled during the third		(µg/dl)	•
trimester of pregnancy, age >		Major findings:	
25 years. Paired samples		No associations were found between thyroid	
available for 26 mother-infant		hormones and maternal or cord blood	
pairs.		concentrations for PFNA.	
•		(Results not presented in the paper).	
Outcome Definition:		(Titolita in the puper).	
Serum concentration at 3 <sup>rd</sup>		Also no associations with birth weight.	
trimester, cord blood at		1	
delivery, and breast milk during			
mother checkup-visit			

Reference and Study Design	Exposure Measures	Results	Comment
Leter et al., 2014	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Multivariate linear regression analysis,	Study population included all degrees of
Study Design:		covariate and confounders assessed include	subfertile men
Cross-sectional		age, BMI, cotinine, alcohol consumption, and	
	Population-Level Exposure:	abstinence time, and spillage	Possible confounding due to unmeasured
Location:	PFNA Average (SE)		variables, including other PFCs.
Greenland, Poland, Ukraine	Greenland: 2.2 (0.2)	PFCs were natural log transformed.	
	Kharkiv: 1.1 (0.1)		Cross-sectional design prevents causal
Population:	Warsaw: 1.4 (0.1)	Outcome: Global methylation levels - Flow	inference.
262 partners of pregnant	Combined: 1.6 (0.1)	cytometric (FCM) DGML	
women (non-occupationally		Major Findings:	
exposed and fertile, at least 18		Combined: β=-38.7 (95% CI -72.8, -4.6)	
years old)			
		Outcome: LINE-1	
Outcome Definition:		Major Findings:	
Sperm global methylation		Combined: $\beta$ =1.1 (95% CI -0.3, 2.5)	
levels: 1). Average DNA			
methylation level in repetitive		Outcome: Alu	
DNA sequences 2). Flow		Major Findings:	
cytometric immunodetection		Combined: $\beta$ =-0.7 (95% CI -1.8, 0.3)	
		Outcome: Satα	
		Major Findings:	
		Combined: β=1.7 (95% CI -1.6, 5.1)	

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Reference and Study Design	Exposure Measures	Results	Comment
Lin et al., 2009	Exposure	Stat Method:	Major Limitations:
	Assessment:	Linear regression, covariates and confounders considered	Cross-sectional design prevents causal
Study Design:	Serum concentrations	include age, sex, race, smoking, alcohol consumption,	inference
Cross-sectional		household income, waist measurement, CRP,	
		insulin/glucose/HOMA, current medications. Logistic	Did not take into account other
<b>Location:</b>	Population-Level	regression used to examine metabolic syndrome.	environmental factors and contaminants
General U.S. population	Exposure:		including other co-occurring PFCs.
	Mean PFNA	PFCs are log-transformed.	
Population:	concentrations for		
NHANES 1999-00 & 2003-04,	adolescents=0.70	Findings shown here are for most adjusted models.	
Adolescents, 12-20 year n=474	ng/mL and		
Adults, >20 years, n=969	adults=0.81 ng/mL	Outcome: Blood glucose (mmol/l)	
		<b>Major Findings:</b> Adolescents $\beta$ = 0.07 ± 0.04, Adults $\beta$ =	
<b>Outcome Definition:</b>		$0.00 \pm 0.04$	
Glucose homeostasis and			
metabolic syndrome/metabolic		Outcome: log-Insulin (pmol/l)	
syndrome components (WC,		<b>Major Findings:</b> Adolescents $\beta$ = -0.10 ± 0.05*, Adults $\beta$ =	
glucose, HDL, and		$-0.04 \pm 0.03$	
triglycerides)			
		Outcome: log HOMA-IR	
		<b>Major Findings:</b> Adolescents $\beta$ = -0.08 ± 0.04, Adults $\beta$ = -	
		$0.04 \pm 0.04$	
		Outcome: log β-cell function	
		<b>Major Findings:</b> Adolescents $\beta$ = -0.12 ± 0.06*, Adults $\beta$ =	
		$-0.04 \pm 0.03$	
		Outcome: Metabolic syndrome	
		Major Findings:	
		Adolescents	
		OR=0.37 (95% CI 0.21,0.64)	
		WC OR=1.09 (95% CI 0.61,1.95)	
		Glucose OR=3.16 (95% CI 1.39, 7.16)	
		HDL <b>OR</b> =0.67 (95% <b>CI</b> 0.45, 0.99)	
		Trigly OR=0.71 (95% CI 0.37, 1.34)	
		Adulta	
		Adults OB=0.02 (05% CL0.60, 1.24)	
		OR=0.92 (95% CI 0.69, 1.24)	
		WC OR=1.34 (95% CI 0.93, 1.92)	
		Glucose OR=0.86 (95% CI 0.66, 1.12)	
		HDL OR=0.81 (95% CI 0.65, 1.00)	
		Trigly OR=0.99 (95% CI 0.81, `1.19)	

Reference and Study Design	Exposure Measures	Results	Comment
Lin et al., 2010	Exposure Assessment:	Stat Method: Linear regression, covariates	Major Limitations:
	Serum concentrations	and confounders considered included age,	Cross-sectional design prevents causal
Study Design:		gender, race/ethnicity, smoking, alcohol	inference.
Cross-sectional	Population-Level Exposure:	consumption, education level, BMI, HOMA-	
	Median PFNA 0.70 ng/mL	IR, metabolic syndrome, and iron saturation	Reverse causality.
Location:		status.	
General U.S. Population			No control for other environmental
		PFNA was modeled separately and included in	chemicals or medications.
Population:		a composite analysis with PFOS, PFOA, and	
NHANES 1999-2000 & 2003-		PFHxS. PFCs assessed as quartiles and natural	
2004, n=2,216. Individuals,		log transformed. Model estimates are shown	
who fasted less than 6 hours,		for most adjusted.	
were hepatitis B or C virus			
carriers were excluded.		Outcome: ALT (U/l)	
		Major Findings:	
Outcome Definition:		Quartiles of PFNA (unadjusted), no trend (p-	
Liver function biomarkers		value=0.16).	
		Separated: β=0.84 (p-value=0.13)	
		Composite: $\beta$ = -0.19 (p-value=0.77)	
		Outcome: log-GGT (U/l)	
		Major Findings: Quartiles of PFNA	
		(unadjusted), no trend (p-value=0.07)	
		Separated: β=-0.00 (p-value=0.86)	
		Composite: $\beta$ = -0.03 (p-value=0.25)	
		Outcome: total bilirubin (μM)	
		Major Findings: Quartiles of PFNA	
		(unadjusted), increasing trend (p-	
		value=0.014)	
		Separated: β=0.49 (p-value=0.05)	
		Composite: β=0.75 (p-value=0.004)	

Reference and Study Design	Exposure Measures	Results	Comment
Lin et al., 2011	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	The relation of PFC variables to categorical	Cross-sectional design prevents causal
Study Design:		variables was tested using the Mann-Whitney	inference
Cross-sectional		U test or Kruskal-Wallis test. Linear regression	
	Population-Level Exposure:	was used for continuous variables. Covariates	The study population is made up of
Location:	The median PFNA serum level	and confounders considered include age,	adolescents and young adults with
Taiwan	was 1.68 ng/mL	gender, smoking, alcohol consumption,	abnormal urinalysis in childhood.
		household income, waist measurement,	
Population:		systolic blood pressure (sBP), total cholesterol,	Did not take into account medications or
n=287 Taiwanese adolescents		HOMA-IR, creatinine. Associations studied	other environmental factors including
and young adults, aged 12-30		over categories of PFNA.	other co-occurring PFCs.
years recruited from a			
hypertension cohort		Results shown here for most adjusted model.	
Outcome definition:		Outcome, Parameters related to glucose	
Serum samples		metabolism	
		Outcome: In-adiponectin (ng/mL)	
		<b>Major Findings:</b> ↑ (p-value <0.01)	
		Outcome: glucose (mg/dL)	
		Major Findings: NS	
		wajor rindings. NS	
		Outcome: In-insulin (pmol/L)	
		Major Findings: NS	
		major rindings. No	
		Outcome: log-HOMA-IR	
		Major Findings: NS	
		Outcome: HDL (mg/dL)	
		Major Findings: NS	
		Outcome: log-TG (mg/dL)	
		Major Findings: NS	
		Outcome: log-CRP (mg/L)	
		Major Findings: NS	

Reference and Study Design	<b>Exposure Measures</b>	Results	Comment
Lin et al., 2013a	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Linear regression and logistic regression,	Cross-sectional design prevents causal
Study Design:		covariates and confounders considered include	inference
Cross-sectional	Population-Level Exposure:	age, gender, smoking status, alcohol	
	Median PFNA serum level = 0.38	consumption, and BMI to estimate association	The study population is made up of
Location:	ng/mL* (range 0.38-25.4)	with cardiovascular risk factors, and	adolescents and young adults with
Taiwan	*most likely an error	additionally, systolic blood pressure (sBP),	abnormal urinalysis in childhood.
		BMI, LDL, CRP, TG, and HOMA-IR for	
Population:	Percentile Mean	Carotid intima-associated thickness (CIMT).	Did not take into account medications or
n=664 individuals with	(ng/mL)		other environmental factors.
abnormal urinalysis results (246	≤60 <sup>th</sup> ≤1.58	Logistic regression analysis was conducted to	
with elevated blood pressure	60 <sup>th</sup> -90 <sup>th</sup> ≤6.78	examine the odds ratios of thicker CIMT for	
and 398 with normal blood	>90 <sup>th</sup> >6.78	PFOS only. Investigators performed a	
pressure) aged 12-30 years,		composite analysis with four PFCs modeled	
who had been originally		together.	
recruited from a population-	Males (ng/mL) –		
based mass urine screening in	1.19 (95% CI 0.56-3.92)	Outcome: systolic blood pressure (SBP) (mm	
Taiwan	Females (ng/mL) –	Hg)	
	1.00 (95% CI 0.24-1.01)	Major Findings: NS (P for Trend 0.321)	
Outcome definition:			
Serum samples, socio-		<b>Outcome:</b> BMI (kg/m <sup>2</sup> )	
demographic data collected		Major Findings: NS (P for Trend 0.043)	
during interview. Clinical			
outcomes were determined		Outcome: LDL (mg/dL)	
from clinical serum measures.		Major Findings: NS (P for Trend 0.811)	
Carotid artery intima-media		Outcome: log-TG (mg/dL)	
thickness (CIMT) is a marker of		Major Findings: NS (P for Trend 0.593)	
subclinical atherosclerosis.		Transport a state and the state of the state	
Sac Mineta atmorphismosts.		Outcome: uric acid (UA) (mg/dL)	
Related studies:		Major Findings: NS (P for Trend 0.689)	
Lin et al., 2011		(2 101 114111 3,000)	
		Outcome: log-HOMA-IR	
		Major Findings: NS (P for Trend 0.009)	
		Outcome: CIMT	
		Major Findings: CIMT decreased	
		insignificantly with increasing levels of PFNA.	

Reference and Study Design	Exposure Measures	Results	Comment
Lin et al., 2013b	<b>Exposure Assessment:</b>	Stat Method:	Major Limitations:
	Serum concentrations	Linear regression and logistic regression,	Cross-sectional design prevents causal
Study Design:		covariates and confounders considered include	inference.
Cross-sectional	Population-Level Exposure:	age, gender, smoking, and alcohol	
	Geometric mean of PFNA, 1.01	consumption.	The study population is composed of 12-
Location:	ng/mL. PFNA was categorized		30 yr olds with abnormal urinalysis results
Taiwan	into three percentile cutoff groups.	TSH was natural log transformed.	in childhood living in the Taipei area.
Population:	Percentile Median	PFNA was explored against different levels of	Did not control for medications that could
n=551 individuals with	Groups (ng/mL)	BMI, smoking, and current hypertension.	be potential confounders, and other
abnormal urinalysis results (221	<60 <sup>th</sup> <1.2	DECC DELL C DECA and DEMA and a dist	unmeasured environmental pollutants.
with elevated blood pressure	60 <sup>th</sup> -90 <sup>th</sup> ≤6.46	PFOS, PFHxS, PFOA, and PFNA are put into	
and 310 with normal blood	>90 <sup>th</sup> >6.46	model. (Did not alter results)	
pressure) aged 12-30 years, who had been originally		Outcome: Free T4 (ng/dl)	
recruited from a population-		Major Findings:	
based mass urine screening in		Mean=1.07, 1.06, 1.12 (P for Trend < 0.05)	
Taiwan		Wedi 1.07, 1.00, 1.12 (1 101 11clid 50.05)	
		The association between FT4 and PFNA was	
<b>Outcome Definition:</b>		significant for active smokers and those with	
Laboratory, examination, and		higher BMI, but tests for interaction were	
survey information.		insignificant.	
		Outcome: In-TSH (m IU/l)	
		Major Findings:	
		Mean=0.43, 0.40, 0.58 (P for Trend NS)	
		1.13, 0.13, 0.13	
		No differences were found between exposure	
		to PFNA related to the OR of being	
		hypothyroid.	

Reference and Study Design	Exposure Measures	Results	Comment
Lind et al., 2013	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Logistic regression to evaluated association	Cross-sectional design prevents causal
Study Design:		with prevalent diabetes, with PFNA (log	inference.
Cross-sectional	Population-Level Exposure:	transformed) treated linearly and squared (for	
		non-linear effects). Covariates and	Confounding due to medications may be
Location:	Percentile Median	confounders considered include sex,	occurring, although participants
Sweden	(ng/mL)	cholesterol, triacylglycerol, BMI, smoking,	underwent a fasting period.
	25 <sup>th</sup> 0.5	exercise habits, energy and alcohol intakes,	
Population:	50 <sup>th</sup> 0.7	and education level. Linear regression used to	Did not take into account other
Adults aged 70 years or older,	75 <sup>th</sup> 1.0	evaluate association with proinsulin/insulin	environmental factors and contaminants
n=1,016, 2001-2004		ratio and HOMA-IR and restricted to non-	including other co-occurring PFCs.
		diabetic participants.	
Outcome definitions:			
Participant response or		Results shown here for most adjusted model.	
laboratory measure		Diabetes defined as having a history of	
		diabetes or a fasting glucose value >7.0 mmol/l	
		Outcome: Diabetes	
		<b>Major Findings:</b> (linear) OR=1.30 (95% CI	
		0.85-1.97); (quadratic) <b>OR=1.25</b> (95% <b>CI</b>	
		1.08-1.44)	
		Outcome: Proinsulin/insulin ratio	
		<b>Major Findings:</b> β=0.043 (95% CI -0.015-	
		0.102)	
		Outcome: HOMA-IR	
		<b>Major Findings:</b> β=0.004 (95% CI -0.059-	
		0.066)	

Reference and Study Design	Exposure Measures	Results	Comment
Lopez-Espinosa et al., 2012	Exposure Assessment:	Stat Method:	Major Limitations:
			Major Limitations: Cross-sectional design prevents causal inference.  Lack of measurement of additional childhood thyroid hormones.  Reliance on recall for thyroid disease  No control for other environmental chemicals including other PFCs.
		Outcome: Hyperthyroidism Major Findings: Subclinical: OR=0.78 (95% CI 0.61, 1.01)	

Reference and Study Design	Exposure Measures	Results	Comment
Louis et al., 2012	Exposure Assessment:	Stat Method: Logistic regression, covariates	Major Limitations:
	Serum concentrations	and confounders considered include age, BMI,	Bidirectional errors reportedly associated
Study Design:		and parity	with endometriosis staging.
Case-control	Population-Level Exposure:		
Location: Salt Lake City or San Francisco  Population: 1. Operative sample (OS):495 women aged 18-44 years scheduled for laparoscopy/laparotomy at one of 14 participating clinical sites, 2007-2009. (190 cases of endo and 283 none)	Tertile         PFNA           1s         -0.21, 0.53           2nd         0.53, 0.84           3rd         0.84, 4.1    Groups  GM (95% CI)  OS/Endo  0.69 (0.63, 0.77)  OS/None  0.58 (0.53, 0.63)  P/None  0.71 (0.55, 0.92)  P/Endo  0.64 (0.55, 0.74)	Outcome: Endometriosis Major Findings: OS: OR (unadj)=2.75 (95% CI 1.30, 5.80) OS: OR (ajdA)=2.20 (95% CI 1.02, 4.75) OS: OR (ajdB)= 1.99 (95% CI 0.91, 4.33)  P: OR (unadj)= 1.31 (95% CI 0.14, 12.0) P: OR (ajdA)=1.52 (95% CI 0.15, 15.1) P: OR (ajdB)=1.63 (95% CI 0.16, 16.9)	Model dependent results.  Possible confounding due to unmeasured variables, and co-occurring environmental contaminants including other PFCs.  Small sample size – especially for population sample with only 14 cases of endometriosis – results in very wide confidence intervals.
2. Population sample (P): Population-based sample consisting of 131 women matched to the operative sample on age and residence within a 50-mile radius of participating clinics (14 cases Endo and 113 none)  Controls from referent population matched on age and residence.		*restricted to stage 3 and 4 of endometriosis. OS: OR=0.99 (95% CI 0.27, 3.65)  *comparison group restricted to postoperative diagnosis of a normal pelvis OS: OR=1.18 (95% CI 0.46, 3.05)	
Outcome Definition: Endometriosis defined through surgical visualization (in the operative sample) or magnetic resonance imaging (in the population sample)			

Reference and Study Design	Exposure Measures	Results	Comment
Monroy et al., 2008	Exposure Assessment:	Stat Method:	Major Limitations:
	Maternal serum concentration at	Paired t-tests and linear regression, covariates	Small sample size.
Study Design:	second trimester and delivery, and	and confounders considered included parity,	
Nested Prospective birth cohort	cord serum concentration	gestational length, birth weight, and gender,	No control for maternal exposures or
		maternal BMI,	other potential confounders including
Location:	Population-Level Exposure:		other PFCs.
Canada	Maternal serum at 24-28 weeks –		
	Median PFNA concentration 0.86	Outcome: Gestational length (cm), Birth	
Population:	ng/mL and range 0.58-0.96	weight (kg), birth gender	
101 mother:infant pairs from		Major Findings:	
large cohort study	Maternal serum at delivery –	No association was found between PFNA in	
	Median PFNA concentration 0.80	maternal serum and cord blood at delivery and	
<b>Outcome Definition:</b>	ng/mL and range 0.54-0.87	birth weight. (Results not presented in paper)	
Measured and recorded at birth			
	Umbilical cord blood – Median		
	PFNA concentration 0.94 and		
	range 0.61-0.80		

Reference and Study Design	Exposure Measures	Results	Comment
Mundt et al., 2007	Exposure Assessment:	Stat Method:	Major Limitations:
	Detailed work histories	Cross-sectional analysis to evaluate pairwise differences in average values	Data are not
Study Design:	using to categorize into	of clinical parameters at the five time points (1976, 1989, 1995, 1998, and	presented for some
Occupational: Cross-sectional	exposure groups.	2001) across exposure groups, additional cross sectional analyses of mean	findings are
and retrospective cohort		laboratory values by exposure groups, and longitudinal analysis	discussed.
-	Population-Level	accounting for multiple measurements in the same individual. Covariates	
Location:	Exposure:	and confounders considered include age and BMI. Longitudinal analysis	Small percentage of
U.S. factory	Exposure categories: no	also included age at entry into cohort, exposure category in the month	subjects in high and
-	exposure, low exposure, and	before blood sample was taken, weighted cumulative intensity score	no exposure groups
Population:	high exposure.		compared to low
630 individuals employed,		Outcome: Pairwise comparisons in average clinical parameters	exposure groups.
actively and formerly, at a	Women classified as only	Major Findings:	
polymer production facility	exposed or not exposed.	LDH: NS	Limited data for
using PFNA surfactant blend		AST: NS	women.
(Surflon S-111) at any time	No serum concentrations.	ALT: Men (1976 - High v. Low; 2001 High v. None)	
between 1 January 1989 and 1		Bilirubin: NS	No serum
July 2003. Final sample size		GGT:NS	concentration data.
was 592 (518 men and 74		Alkaline phosphatase: Men (1998 High v. None)	
women)		Cholesterol (total): Men (1976 High v. Low, Low v. None; 1989 High v.	Further: Exposure in
		Low, Low v. None)	the least exposed
<b>Outcome Definition:</b>		Triglycerides: NS	groups may be well
Laboratory test results (32		HDL: NS	above the population
clinical parameters) were		LDL: NS	exposure range.
abstracted from annual medical		VLDL: NS	
examination records.			
		No significant findings reported in women.	
		Data for electrolytes, BUN, creatinine, thyroid hormones (TSH, T4, T3	
		uptake, and free thyroxine uptake), and uric acid are not shown. Let to	
		assume non-significant findings.	
		ussume non significant manags.	
		Outcome: Extended cross-sectional analysis	
		Major Findings: Data for the extended cross-sectional analysis is not	
		presented. It is reported that values fluctuated slightly across exposure	
		groups over the years and that no group mean was consistently increased	
		or decreased over time.	
		of decidated over time.	
		<b>Outcome:</b> Longitudinal analysis of 7 clinical parameters (men only)	
		Major Findings: total cholesterol, GGT, AST, ALT, alkaline	
		phosphatase, bilirubin, triglycerides) – no significant increase or decrease.	
		phosphatase, omittom, trigiyeerides) no significant metease of decrease.	

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Reference and Study Design	Exposure Measures	Results	Comment
Nelson et al., 2010	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Regression, covariates and confounders	Cross-sectional design prevents causal
<b>Study Design:</b>		considered include age, sex, race/ethnicity,	inference.
Cross-sectional		socioeconomic status, saturated fat intake,	
	Population-Level Exposure:	exercise, TV time, alcohol consumption,	The authors note that correlation with
<b>Location:</b>	Median PFNA serum level = 1.0	smoking, and parity in women.	PFOA and/or PFOS could partially
General U.S. population	ng/mL		explain the results, although PFNA was
	Range 0.1-10.3 ng/mL	Effect estimates of each quartile to the lowest	only moderately correlated with them
Population:		quartile. Test for trend performed.	(r=0.5).
NHANES 2003-2004, < 80	Median		
years old	Quartiles (ng/mL)	Outcome: TC (mg/dL)	
N=416 or 860 depending on	1 0.4	Major Findings: ↑ Test for trend p=0.04	
parameter	2 0.7		
	3 1.0	Outcome: HDL (mg/dL)	
	4 2.0	<b>Major Findings:</b> ↓ Test for trend p=0.31	
Outcome definition:			
Serum samples, and		Outcome: non-HDL (mg/dL)	
anthropometric measures		Major Findings: ↑ Test for trend p=0.04	
		Outcome: LDL (mg/dL)	
		Major Findings: ↑ Test for trend p=0.08	
		Outcome: BMI (kg/m²), waist circumference	
		(WC) (cm), HOMA-IR (insulin resistance	
		assessed as Homeostatic Model Assessment)	
		Major Findings: PFNA was not associated	
		with BMI, WC, or HOMA (results not	
		presented in paper)	
		r ····································	

Reference and Study Design	Exposure Measures	Results	Comment
Ode et al., 2014	Exposure Assessment:	Stat Method:	Major Limitations:
	PFC concentrations measured in	Differences in PFC concentrations between	Small study size – significant loss of
Study Design:	umbilical cord serum samples.	cases and controls were compared using the	potential cases.
Matched case-control		Wilcoxon's paired test. Conditional logistic	
(prospective)	For PFNA concentrations above	regression was used to evaluate possible	Possible confounding due to unmeasured
	the level of detection (0.2 ng/mL)	threshold effects. Confounders and covariates	variables and other environmental
Location:	were compared to those above.	considered include smoking during pregnancy,	contaminants, including other PFCs.
Malmo, Sweden	_	parity, and gestational age at birth.	-
	Population-Level Exposure:		
Population:	PFNA concentrations not	PFNA categorized as high v. low.	
Children born between 1978-	provided.		
2000 that were followed up		Outcome: ADHD	
until 2005. Cases were children	PFOA in Cases – 1.80 ng/mL	Major Findings:	
with ADHD (n=206). Controls	PFOA in Controls – 1.83 ng/mL	No difference between cases and control	
selected from same study base,	_	PFNA concentration (p-value 0.48)	
matched on year of birth and	PFOS in Cases – 6.92 ng/mL	_	
maternal country of birth	PFOS in Controls – 6.77 ng/mL	OR adj=1.1 (95% CI 0.75, 1.7)	
(n=206).			
		No significant associations between cord blood	
<b>Outcome Definition:</b>		PFC concentrations and ADHD.	
Clinician diagnosed ADHD			

Reference and Study Design	Exposure Measures	Results	Comment
Power et al., 2013	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Logistic regression, covariates and	Cross-sectional design prevents causal
Study Design:		confounders considered include age, age-	inference.
Cross-sectional	Population-Level Exposure:	squared, race/ethnicity, gender, cycle,	
	Geometric mean of PFNA was	education, poverty-income ratio, food security,	Reverse causality
Location:	1.01 ng/mL.	health insurance, social support, physical	
General U.S. population		activity, smoking, and alcohol consumption	Possible confounding due to unmeasured
		and diabetes assessed as an effect modifier.	variables and other environmental
Population:			contaminants, including other PFCs
NHANES 1999-2000 & 2003-		PFNA natural log transformed, estimates based	
2008, adults aged 60-85 years		on a doubling of PFNA.	Outcome definition depends on self-
of age with PFC measurements			report.
n=1,766		Outcome: Difficulty remembering or periods	
		of confusion	
Outcome Definition:		Major Findings:	
Cognitive ability was measured		OR=0.91 (95 % CI 0.79, 1.04)	
by the main outcome, self-			
reported difficulty due to		Outcome: Senility	
remembering or periods of		Major Findings:	
confusion, and secondarily the		OR=0.92 (95% CI 0.59, 1.44)	
outcomes self-reported			
difficulty with activities of		Outcome: DSST	
daily-living due to senility and		Major Findings:	
performance on the Digit-		OR=0.29 (95% CI -1.69, 2.26)	
Symbol Substitution Task			
(DSST) was investigated.			

Reference and Study Design	Exposure Measures	Results	Comment
Specht et al., 2012	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	General linear models. Covariates and	Serum levels of the individuals PFCs were
Study Design:		confounders considered include sexual	highly and significantly correlated.
Cross-sectional	Population-Level Exposure:	abstinence period, age, BMI, caffeinated	
	Median PFNA (ng/mL) and Range	drinks, cotinine, fever during past 3 months,	Cross-sectional design prevents causal
Location:		self-reported genital infections, and testicular	inference.
Greenland, Poland, Ukraine	Greenland: 1.4 (0.5-12)	disorders, and spillage of semen sample.	
	Poland: 1.2 (0.5-6)		Varying participation rates.
Population:	Ukraine: 1.0 (0.2-4)	All analyses were stratified by region	
604 fertile male partners of			Blood samples were collected
pregnant women (199 from		Outcome: DNA damage in sperm	approximately a year before the semen
Greenland, 197 from Poland,		Major Findings:	samples. Long half-lives make it unlikely
208 from Ukraine)		Estimates for associations with PFNA not	that a skewed sampling is unlikely.
		provided in paper:	
Outcome Definition:			
DNA damage in spermatozoa		An association of PFNA with sperm DNA	
by sperm chromatin structure		fragmentation was not found in any of the	
assay (SCSA) and in situ		three regions in uncorrected analyses, and	
terminal deoxynucleotidyl		similar results were obtained after adjustment	
transferase dUTP nick-end		for potential confounders."	
labeling (TUNEL) assay,			
apoptotic markers in semen,		PFNA was not associated with TUNEL-	
and reproductive hormones in		positivity	
serum			
		No other associations between PFNA and	
		apoptotic markers were consistent across	
		regions or in models within regions. PFNA	
		were not consistently related to SHBG	
		concentrations and associations were not	
		consistent across region for testosterone,	
		estradiol, and gonadotropins.	

Reference and Study Design	Expos	ure Measures	Results	Comment
Starling et al., 2014a	Exposure Assessment:		Stat Method:	Major Limitations:
	Serum concer	ntrations	Proportional hazards model, covariates and	Correlations with other PFCs makes it
Study Design:			confounders considered include maternal age	difficult to tease out the impact of PFNA
Nested case-control	Population-L	Level Exposure:	at delivery, pre-pregnancy BMI, maternal	independently.
	_		educational level, smoking at mid-pregnancy,	
Location:	Danasatila	Median	plasma creatinine, cystatin C, HDL	Variation in exposure in exposure
Norway	Percentile	(ng/mL)	cholesterol.	concentrations.
	25 <sup>th</sup>	0.39		
Population:	50 <sup>th</sup>	0.54	PFNA categorized into quartiles and log	Possible confounding due to unmeasured
Nulliparous pregnant women	75 <sup>th</sup>	0.74	transformed continuous. Adjusted estimates	variables.
(466 cases of preeclampsia, 510		1	presented here.	
non-cases) selected from a				Possible selection bias, participation rate
prospective pregnancy cohort			Outcome: Preeclampsia	in cohort was 39%
(MoBa), 16-44 years.			Major Findings:	
			Q2 v. Q1, HR=0.85 (95% CI 0.60, 1.22)	
<b>Outcome Definition:</b>			Q3 v. Q1, HR=0.92 (95% CI 0.64, 1.21)	
Medical record review -			Q4 v. Q1, HR=0.80 (95% CI 0.56, 1.15)	
validated			Continuous, HR=0.84 (95% CI 0.66, 1.07)	

Reference and Study Design	Exposure Measures	Results	Comment
Starling et al., 2014b  Study Design: Cross-sectional  Location: Norway  Population: Pregnant women (n=891), enrolled in the Norwegian Mother and Child (MoBa) Cohort Study, 2003-2004  Outcome definition: Serum samples	Exposure Assessment: Non-fasting plasma samples taken at mid- pregnancy  Population-Level Exposure: Median PFNA serum level = 0.39 ng/mL  Percentile Median (ng/mL) 5th 0.17 25th 0.29 50th 0.39 75th 0.51 95th 0.27	Stat Method: Linear regression, covariates and confounders considered include maternal age, prepregnancy BMI, nulliparous or most recent inter-pregnancy interval, duration of breastfeeding most recent child, maternal years of education, current smoking at midpregnancy, gestational weeks at blood draw, and amount of oily fish consumed daily, and weight gain, and albumin.  PFNA treated as continuous In-PFNA and as quartiles, and effect estimates for quartiles, log unit increase, and IQR increase  Outcome: TC (mg/dL)  Major Findings:  Q2 v. Q1 β=-5.28 (95% CI -12.75, 2.19)  Q3 v. Q1 β=-5.28 (95% CI -647, 10.90) Ln-unit β=0.01 (95% CI -5.98, 6.00)  IQR β=0.01 (95% CI -5.98, 6.00)  IQR β=0.01 (95% CI -2.60, 2.47)  Q3 v. Q1 β=-3.26 (95% CI -2.60, 2.47)  Q3 v. Q1 β=-3.26 (95% CI -2.73, 3.6)  Outcome: HDL (mg/dL)  Major Findings:  Q2 v. Q1 β=-3.84 (95% CI 0.97, 4.71)  IQR β=1.66 (95% CI 0.57, 2.76)  Outcome: LDL (mg/dL)  Major Findings:  Q2 v. Q1 β=-0.81 (95% CI -8.30, 6.69)  Ln-unit β=-2.51 (95% CI -4.29, 1.77)  Outcome: In-triglycerides (mg/dL)  Major Findings:  Q2 v. Q1 β=-0.03 (95% CI -4.29, 1.77)  Outcome: In-triglycerides (mg/dL)  Major Findings:  Q2 v. Q1 β=-0.02 (95% CI -0.09, 0.05)  Q4 v. Q1 β=-0.02 (95% CI -0.09, 0.05)	Major Limitations: Cross-sectional design prevents causal inference  Did not take into account other environmental factors and contaminants including other co-occurring PFCs.
		Ln-unit $\beta$ =-0.02 (95% CI -0.07, 0.03) IQR $\beta$ =-0.01 (95% CI -0.04, 0.02)	

Reference and Study Design	Exposu	re Measures	<b>S</b>	Results	Comment
Taylor et al., 2014	Exposure Assessment:			Stat Method:	Major Limitations:
	Serum concentra	tions		Proportional hazard modeling, covariates and	PFC measures based on a single
Study Design:				confounders considered include age, race,	measurement.
Cross-sectional	Population-Leve	el Exposure	:	parity, education,	
					Correlations with other PFCs makes it
Location:	Category	Median	IQR	Hazard ratios calculated as the onset of	difficult to tease out the impact of PFNA
General U.S. population		(ng/mL)		natural menopause as a function of age and	independently.
	Pre	0.90	0.60,	serum PFNA concentration. Premenopausal	
Population:	menopause	0.70	1.40	women were censored at the time of their	Reverse causality may explain
NHANES 1999-2000 & 2003-	Menopause	1.20	0.80,	survey.	association of PFNA and earlier age at
2010, women aged 20-65 years	Wichopause	1.20	1.80		menopause.
of age with PFC measurements	Hysterectomy	1.30	0.80,	Side note: Also look at both the association of	
n=2,732	11) Stereotomy	1.50	1.20	PFC and hysterectomy and whether rate of	Cross-sectional design prevents causal
O-toons Definition				natural menopause predicts serum	inference.
Outcome Definition: Premenopausal v. post-				concentrations to assess reverse causality. HR calculated with increasing tertiles of PFNA.	
menopausal categorized by				calculated with increasing termes of PFNA.	
questionnaire responses				Outcome: Menopause	
questionnaire responses				Major Findings:	
				T2 v. T1, HR=1.43 (95% CI 1.08, 1.87)	
				T3 v. T1, HR=1.47 (95% CI 1.14, 1.90)	
				15 (11,111 1.77 (5576 €11.17,1156)	
				Outcome: Hysterectomy	
				Major Findings:	
				T2 v. T1, HR=1.39 (95% CI 1.08, 1.80)	
				T3 v. T1, HR=1.78 (95% CI 1.33, 2.37)	
				Assessing reverse causality:	
				Positive associations between PFNA and the	
				rate of hysterectomy, and PFNA increased	
				with time since natural menopause.	

Reference and Study Design	Exposure Measures	Results	Comment
Toft et al., 2012	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Multivariate linear regression analysis, covariate and	
Study Design:		confounders assessed include age, BMI, cotinine,	Measured PFCs are highly correlated;
Cross-sectional	Population-Level	alcohol consumption, abstinence time, spillage,	mutual adjustments are presented as
	Exposure: PFNA (ng/mL)	urogenital infections.	subanalyses.
Location:	Greenland		
Greenland, Poland, and Ukraine	Estimates PFNA	Additionally used generalized-linear model to allow for	Male semen quality is known to vary
	Median 1.7	possibly non-linear associations.	considerably from day to day.
Population:	33 <sup>rd</sup> per. 1.3		
588 partners of pregnant	66 <sup>th</sup> per. 2.4	PFCs natural log transformed	Cross-sectional design prevents causal
women (Greenland n=196,			inference.
Poland n=189, Ukraine n=203)	Poland	Analyses were stratified by population type	
	Estimates PFNA		
Outcome Definition:	Median 1.2	Outcome: Sperm concentration	
Semen volume, sperm	33 <sup>rd</sup> per. 1.0	Major Findings:	
concentration, total sperm	66 <sup>th</sup> per. 1.3	Adj. DiffT2-T1: -1 (95% CI, -19, 18)	
count, motility and morphology	GO PCI:   1.5	Adj. DiffT3-T1: 7 (95% CI, -13, 28)	
	Ukraine	p-value=0.53	
	Estimates PFNA		
	Median 1.0	Outcome: Volume	
	L	Major Findings:	
	33 <sup>rd</sup> per. 0.8	Adj. DiffT2-T1: 0 (95% CI, -11, 12)	
	66 <sup>th</sup> per. 1.2	Adj. DiffT3-T1: -5 (95% CI, -17, 7)	
		p-value=0.34	
	All		
	Estimates PFNA	Outcome: Total count	
	Median 1.2	Major Findings:	
	33 <sup>rd</sup> per. 1.0	Adj. DiffT2-T1: 2 (95% CI, -21, 24)	
	66 <sup>th</sup> per. 1.5	Adj. DiffT3-T1: 5 (95% CI, -19, 29)	
		p-value=0.93	
		Outcome: Percent motile sperm	
		Major Findings:	
		Adj. DiffT2-T1: 0 (95% CI, -12, 11)	
		Adj. DiffT3-T1: -1 (95% CI, -13, 11)	
		p-value=0.34	
		Outcome: Percent normal cells	
		Major Findings:	
		Adj. DiffT2-T1: -12 (95% CI, -26, 2)	
		Adj. DiffT3-T1: -8 (95% CI, -23, 7)	
		p-value=0.36	

Reference and Study Design	Exposure Measures	Results	Comment
Wang et al., 2011	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations in cord	Linear regression for IgE; covariates and	Blood PFC levels were not measured at 2
Study Design:	blood at delivery	confounders considered included gender,	years of age.
Prospective birth cohort		gestational age, parity, maternal age, and pre-	
	Population-Level Exposure:	natal ETS exposure. Logistic regression as	Did not control for other co-occurring
Location:	Median PFNA 2.30 (0.38-63.87)	used to analyze atopic dermatitis: covariates	environmental contaminants including
Taiwan	ng/mL	and confounders considered included gender,	PFCs or other possibly important
		gestational age, maternal age, maternal history	confounders.
Population:		of atopy, duration of breast feeding, and pre-	
Children of pregnant women		natal ETS exposure.	
enrolled in study and had cord			
blood collected at delivery,		Outcomes and exposure were log-transformed.	
n=244 children after exclusions		Most adjusted model results are shown.	
Outcome Definition:		Outcome: log-serum IgE (KU/l)	
Atopic dermatitis and IgE levels		Major Findings:	
in cord blood and serum		(Cord Blood): β=0.024 (p-value 0.91)	
concentrations at 2 years of age		(@ 2 years): β=0.039 (p-value 0.84)	
		Outcome: Atopic dermatitis	
		Major Findings:	
		(Cord Blood):	
		Q2 v. Q1 OR=1.46 (95% CI 0.35, 6.07)	
		Q3 v. Q1 OR= 1.53 (95% CI 0.59, 3.93)	
		Q4 v. Q1 OR=0.72 (95% 0.23, 2.21)	

Reference and Study Design	Exposure Measures	Results	Comment
Wang et al., 2013	Exposure Assessment:	Stat Method:	Major Limitations:
	Serum concentrations	Linear and logistic regression, covariates and	Cross-sectional design prevents causal
Study Design:		confounders considered included age,	inference.
Cross-sectional	Population-Level Exposure:	gestational age at blood draw, pre-pregnancy	
	Geometric mean of PFNA 0.37	BMI, parity, smoking during pregnancy,	Reverse causation.
Location:	(95% 0.36, 0.39)	interval between birth and current pregnancy,	
Norway		duration of breast-feeding a previous child,	TSH levels change throughout pregnancy
	Percentile Median	total seafood intake, HDL, and albumin, and	so a single measurement may not
Population:	(ng/L)	also consumption of fatty fish and thyroid	adequately characterized thyroid
903 pregnant women, recruited	25 <sup>th</sup> 0.28	hormone affecting medication.	homeostasis during pregnancy.
from a case-control study in a	50 <sup>th</sup> 0.39	TOTAL CONTRACTOR OF THE SECOND	Did a did
subset of the MoBa cohort, who	75 <sup>th</sup> 0.51	TSH log transformed. Stratified by subfecund	Did not control other unmeasured
had blood sample and had a live		and control group. Findings for adjusted models shown.	environmental pollutants.
birth. [950 women from case- control study, 400 subfecund		models shown.	Participation in MoBa was low.
women selected randomly and		Outcome: ln-TSH (μΙU/mL)	1 articipation in Moba was low.
550 control women selected at		Major Findings:	
random], 18 to 44 years		$\beta$ =0.165 (95% CI -0.023, 0.353)	
randomj, 10 to 44 years		p=0.103 (7578 C1 =0.023, 0.333)	
<b>Outcome Definition:</b>		No significant associations found between	
Blood sample taken at 17-18		PFNA and dichotomized TSH in logistic	
weeks of gestation and self-		models.	
reported.			
		Outcome: thyroid disease	
		Major Findings:	
		No association with self-reported thyroid	
		disease when PFNA treated continuously and	
		categorical/	
		Stratification was non-significant.	

Reference and Study Design	Exposure Measures	Results	Comment
Wang et al., 2014a	Exposure Assessment:	Stat Method:	Major Limitations:
	Maternal provided blood samples	Linear regression; covariates and confounders	PFNA was highly correlated with two
Study Design:	for serum concentration of PFNA	considered included maternal age, maternal	other PFCs making it difficult to
Cross-sectional and prospective		education, previous live births, family income,	distinguish individual associations.
birth cohort	Population-Level Exposure:	maternal pregnancy body mass index, and	
Location:	Percentile ng/mL	maternal fish consumption during pregnancy	Also cross-sectional design prevents causal inference.
Central Taiwan	25 <sup>th</sup> 0.85	Estimated effect size is presented as the	
	50 <sup>th</sup> 1.51	percent of $\beta$ to the mean hormone	
Population:	75 <sup>th</sup> 2.51	concentration with 95% confidence interval	
Subjects from a longitudinal	95 <sup>th</sup> 6.20	and corresponding p-value (which is presented	
birth cohort study of pregnant		here. Estimates calculated with and without	
women and children, n=285		log-transformation of thyroid hormones.	
pregnant women (mean age			
28.8 years) and 116 neonates.		Outcome: maternal free T4 (ng/dL)	
0 1 5 6 11		<b>Major Findings:</b> $\downarrow$ (p < 0.001)	
Outcome Definition:		0.4	
Four thyroid hormones in		Outcome: maternal total T4 (ng/dL)	
pregnant women (third		<b>Major Findings:</b> $\downarrow$ (p < 0.01)	
trimester) and cord serum		O-4	
thyroid hormones in neonates		Outcome: maternal total T3 (µg/dL)	
		Major Findings: NS	
		Outcome: maternal TSH (µIU/mL)	
		Major Findings: NS	
		Outcome: cord free T4 (ng/dL)	
		Major Findings: NS	
		Outcome: cord total T4 (ng/dL)	
		Major Findings: $\downarrow$ (p < 0.05)	
		(p - 0.00)	
		Outcome: cord total T3 (µg/dL)	
		<b>Major Findings:</b> $\downarrow$ (p < 0.01)	
		Outcome: cord TSH (µIU/mL)	
		Major Findings: NS	

Reference and Study Design	Exposure Measures	Results	Comment
Watkins et al., 2013	Exposure Assessment:	Stat Method: Linear regression, covariates	Major Limitations:
	Serum concentrations	and confounders considered include age, sex,	Cross-sectional design prevents causal
Study Design:		race, smoking, and household income, and also	inference.
Cross-sectional	Population-Level Exposure:	regular exercise and BMI, and total	
	PFNA median 1.5 ng/mL: PFNA	cholesterol.	Possible reverse causation (at least partly
Location:	interquartile range (0.51 ng/mL)		explains results) – decreased GFR could
United States – Ohio and West		PFNA was log-transformed.	lead to increased PFC serum
Virginia	*side note: Historical serum		concentrations – slower elimination of
	PFOA concentrations were	Quartiles of PFNA were also considered and a	PFCs.
Population:	estimated	test for trend was performed.	
Children aged 1 to <18 years of			Possible confounding due to unmeasured
age from a community exposed		Estimates from most adjusted models are	variables and other environmental
to PFOA contaminated drinking		provided here.	contaminants, including other PFCs
water			
		Outcome: change in eGFR	
<b>Outcome Definition:</b>		Major Findings:	
Serum creatinine from blood		-0.88 (-1.41, -0.36) p-value=0.001	
sample and height (used to		Linear trend of PFNA quartiles p-	
calculate estimated glomerular		value=0.005	
filtration rate (eGFR)) – which			
is a measure of kidney function.			

Reference and Study Design	<b>Exposure Measures</b>	Results	Comment
Watkins et al., 2014	Exposure Assessment:	Stat Method:	Major Limitations:
	Averaged serum concentrations	Linear regression with PFCs modeled as	Cross-sectional design prevents causal
Study Design:	from 2005-2006 survey collection	linearly, as natural log transformed and as	inference.
Cross-sectional	and 2010 follow-up		
Cross-sectional  Location: United States – Ohio and West Virginia  Population: Subset of C8 Health Survey participants (consumed water (for at least 1 year) from a water district with known PFOA contamination). Participants were 20-60 years of age, agreed to follow-up in 2010. Participants were ineligible is they had cancer, were taking anti-inflammatory medication, or had or have an active infection. Present analysis: n=685  Outcome Definition: % LINE-1 DNA methylation (epigenetic mechanism-hypomethylation of LINE-1 elements has been associated with genomic instability, risk of cancer, cerebrovascular	and 2010 follow-up  Population-Level Exposure: The geometric mean PFNA serum level was: @05-06- 0.3 ng/mL @2010- 1.3 ng/mL @average- 1.4 ng/mL  The GM of additional PFCs (averaged – ng/mL): PFOA=57.9 PFOS=14.1 PFHxS=2.6	tertiles. Confounders and covariates considered include age, gender, BMI, smoking, and current alcohol consumption. Also total cholesterol and LDL-C were assessed as confounders.  Stratification by gender also performed.  Estimates presented are absolute differences in outcome associate with IQR increases.  Outcome: Line-1 DNA methylation  Major Findings:  Unadjusted Difference- 0.102 (p-value 0.03)  Adjusted Difference- 0.064 (p-value 0.19)	Did not control for other co-occurring environmental contaminants including PFCs or other possibly important confounders.  Possibly confounding by leukocyte type not.  Imprecise measurement of DNA methylation (a more precise measure of changes associated with PFCs may have been to focus on promoter regions of specific genes associated with PPARs -if DNA methylation is indeed affected by PFCs through activation of PPARs).
(epigenetic mechanism- hypomethylation of LINE-1 elements has been associated with genomic instability, risk of			

Reference and Study Design	Exposure Measures	Results	Comment
Webster et al., 2014	Exposure Assessment:	Stat Method:	Major Limitations:
	Maternal serum concentrations in	Mixed effects linear models with random	Small sample size, especially in TPOAb
Study Design:	early 2 <sup>nd</sup> trimester of pregnancy	intercept for individual. Confounders and	group (n=14)
Prospective cohort study		covariates considered include maternal age,	
	Population-Level Exposure:	ethnicity, education, household income,	Did not assess co-exposures
Location:	Median serum concentration of	current stress levels, smoking, environmental	
Vancouver, Canada	PFNA 0.60ng/mL (range <0.5-	tobacco smoke exposure, drug use, alcohol	Study population is not representative of
	1.8) – pregnant women	use, and the use of iodized salt and prenatal	general population
Population:		vitamins containing iodine. PFCs and	
Euthyroid pregnant women	Median:	hormones not transformed.	Reverse causation
(n=152) enrolled in the	PFHxS=1.0 ng/mL		ļ
Chemicals, Health and	PFOA=1.7 ng/mL	Sensitivity analysis stratified by high v. normal	*PFOS and PFOA were strongly
Pregnancy (CHirP) study	PFOS=4.8 ng/mL	TPOAb (thyroid peroxidase antibody levels – a	correlated; all other PFCs were poorly to
[participants had to be non-		marker of autoimmune hypothyroidism).	moderately correlated. The PFCs were
smokers, singleton birth, and			poorly correlated with other suspected
conceived naturally, no prior		Estimates presented for most adjusted models	thyroid disrupting compounds in the same
diagnosis of thyroid or		and a IQR increase in PFNA.	serum sample (PBDEs, PCBs, and
endocrine conditions, no			organochlorine pesticides )
thyroid medication, and $\geq 19$		<b>Outcome:</b> Free thyroxine (fT4) (pmol/L)	
years of age]		Major Findings:	
		Normal TPOAb:β=0.004 (95% CI -0.2, 0.2)	
Outcome Definition:		High TPOAb: $\beta$ =-0.3 (95% CI -1.0, 0.5)	
Repeated measures of maternal			
thyroid hormones (15 and 18		<b>Outcome:</b> total thyroxine (T4) (pmol/L)	
week weeks of gestation)		Major Findings: No associations found,	
		estimates not presented in paper	
		Outcome: TSH (mIU/L)	
		Major Findings:	
		Normal TPOAb: β=0.1 (95% CI -0.05, 0.3)	
		High TPOAb: β=0.6 (95% CI 0.1, 1.0)	

Reference and Study Design	<b>Exposure Measures</b>	Results	Comment
Wen et al., 2013  Study Design: Cross-sectional  Location: General U.S. population  Population: NHANES 2007-2010 adults >20 years of age, n=1,180  Outcome Definition: Laboratory measures	Exposure Assessment: Serum concentrations  Population-Level Exposure: Geometric mean of PFNA 1.54 (95% CI 1.48-1.59) ng/mL	Stat Method: Linear regression and logistic regression, covariates and confounders considered included age, gender, race, alcohol consumption, smoking, and urinary iodine. Modeled separately for men and women.  Free T4, free T3, TSH, thyroglobulin, urinary iodine, and PFNA were natural log-transformed.  PFCs were modeled separately and in a composite model. Most adjusted results shown below.  Outcome: total T4 (µg/mL)  Major Findings:  Men: β=-0.164 (95% CI -0.361, 0.033)  Women: β=-0.097 (95% CI -0.251, 0.445)  Outcome: ln- free T4 (ng/dL)  Major Findings:  Men: β=0.021 (95% CI -0.050, 0.007)  Women: β=-0.015 (95% CI -0.038, 0.008)  Outcome: total T3 (ng/dL)  Major Findings:  Men: β=-2.946 (95% CI -6.073, 0.181)  Women: β=2.434 (95% CI -1.964, 6.832)  Outcome: ln-free T3 (pg/mL)  Major Findings:  Men: β=0.002 (95% CI -0.011, 0.016)  Women: β=0.014 (95% CI -0.001, 0.030)  Outcome: ln-TSH (mIU/L)  Major Findings:  Men: β=-0.030 (95% CI -0.111, 0.051)  Women: β=-0.093 (95% CI -0.111, 0.051)  Women: β=-0.093 (95% CI -0.189, 0.003)  Outcome: ln-TG (ng/mL)  Major Findings:  Men: β=-0.072 (95% CI -0.192, 0.048)  Women: β=0.086 (95% CI -0.057, 0.230)	Major Limitations: Cross-sectional design prevents causal inference.  A common physiology could influence serum PFCs and thyroid functions independent of exposure.  Did not control for medications that could be potential confounders, and other unmeasured environmental pollutants.  Serum thyroid measures collected at a single time point for each participant, although previous reports demonstrated that measures of thyroid function in an individual are maintained with relatively narrow limits over time.

DRAFT	DRAFT	DRAFT	
	Outcome: Subclinical Major Findings: Men: OR=1.30 (95% C Women: OR=2.54 (959	CI 0.65, 2.60)	
	Outcome: Subclinical Major Findings: Men: OR=2.41 (95% C) Women: OR=1.91 (95%	CI 0.48, 12.04)	

## APPENDIX 3. Individual Study Tables of Toxicological Studies of PFNA

Reference and Study Design	Results	Comment
Das et al. (2015).	Severe maternal toxicity at 10 mg/kg/day	Serum PFNA levels
Developmental toxicity of	Substantial weight loss starting at GD 8. All mice in this dose group were	were measured in adults
perfluorononanoic acid in mice.	sacrificed on GD 13, and all pregnant mice had full litter resorptions.	on GD 17 and PND 28,
		and in offspring on days
Species and strain:	PFNA concentration in serum and liver	1, 10, 24, 42, and 70.
Timed-pregnant CD-1 mice	Data presented graphically.	
	■ Liver and serum PFNA ↑ with dose in:	Histopathological
Group size:	-GD 17 pregnant and non-pregnant adult females	examination was not
19-27 per dose group, subdivided	-GD 17 fetuses (livers only, serum not analyzed)	performed on liver or
as follows:	-Dams at post-weaning on PND 28	other organs.
· Sacrificed for maternal and fetal	-Pups followed from PND 1 to PND 70.	
examination on GD 17 (8-10 per	Serum PFNA (numerical data obtained from investigator, C. Lau)	Mice that had no live or
dose group).	● On GD 17, serum PFNA generally ~2x higher in non-pregnant than in	dead fetuses at sacrifice
Allowed to give birth (11-17 per	pregnant adult female mice. Lower PFNA serum levels in pregnant mice are	on GD 17 were
dose group).	presumed to be due to transfer to the fetal compartment.	considered to be non-
	● In pups, similar in males and females from PND 1 to PND 70.	pregnant
Test article and vehicle:	In pups soon after birth (PND 1), similar to maternal serum levels on GD 17.	
PFNA (97% pure, stated by	• In pups, serum PFNA ↓ at PND 70 to about 4-7% of PND 1 levels.	
supplier to be primarily linear) in	● In pups, serum PFNA persisted at low levels at 43 weeks (10 months), the last	Gene expression in
water.	time point assessed. In males, levels were about 1% of those at PND 1, and in	fetal and pup liver
Davida of assessment	females, about 0.2-0.4% of PND 1 (Numerical data provided by C. Lau.)	Real time PCR analysis
Route of exposure:	Liver PFNA	was used to study the expression of genes of
Oral gavage.	● In pregnant, non-pregnant, and post-weaning (PND 28) female adults, PFNA	interest in livers from
Evnagura lavalar	in liver was about 5-10 times higher than serum PFN levels in the same dose	fetuses (GD 17) and
Exposure levels: 0, 1, 3, 5, or 10 mg/kg/day.	groups. Liver levels generally paralleled serum levels.	pups on PND 1, 24, 42,
J, 1, 3, 5, 01 10 mg/kg/day.	PFNA levels In fetal livers on GD 17 were similar to maternal PFNA serum	and 70. PFNA clearly
Exposure regimen:	levels at the same time point.	caused expression of
Mice sacrificed on GD 17: GD 1-	• In the livers of pups, PFNA levels declined more slowly than serum levels over	genes associated with
16.	time. PFNA in liver was about 3-fold higher than PFNA serum levels at PND 1.	PPAR-alpha activation in
Mice allowed to give birth and	At PND 70, PFNA liver PFNA concentrations were about 12-18% of PND 1	fetal and pup liver.
sacrificed on PND 28: GD 1-17	levels.	Gene changes
	● In pups, PFNA persisted at low levels in liver until 43 weeks (10 months), the	associated with PPAR-
	last time point assessed. In male offspring at age 10 months, PFNA in liver was	alpha persisted until
	about 2-4% of PND 1 levels, and in females, about 0.1-0.3% of PND 1 levels	PND 42, although the
		effects were weaker
	(Numerical data obtained from C. Lau).	after PND 24.

Results	Comment
Maternal weight gain, pregnancy outcome, and fetal abnormalities (1, 3, 5 mg/kg/day)  ■ Maternal body weight gain through GD 17: No effect.  ■ Pregnancy outcome: No significant effects on full litter resorptions, # of implants, # or % live fetuses, prenatal litter loss, or fetal weight.  ■ Fetal abnormalities (skeletal and visceral): No effect.	
Postnatal mortality  ■ Data presented graphically.  ■ Not affected at 1 and 3 mg/kg/day.  ■ Severely affected at 5 mg/kg/day. Survival at PND 21: < 20% compared to > 80% in controls.  - Neonatal mortality was gradual, with a sharp ↑ during PND 2-10.  - Pups were weak and failed to thrive, although lack of maternal care was not observed.  - Milk was present in stomachs of pups after death, indicating that they were able to suckle and swallow (C. Lau, personal communication).	
Offspring body weight  ■ Data presented graphically.  ■ On PND 1-24, dose-related ↓ at all doses, with statistical significance at 3 and 5 mg/kg/day.  ■ At weaning, 3 mg/kg/day and 5 mg/kg/day groups about 27% and 50% lower than the controls, respectively.  ■ Decrements persisted until PND 287 (9 months of age) and were significant in males at this time point.	
Markers of post-natal development (day of eye opening, day of vaginal opening, and day of preputial separation)  • Data presented graphically.  • Dose-dependent delays, with statistically significant for all three endpoints at 3 and 5 mg/kg/day.	
	Maternal weight gain, pregnancy outcome, and fetal abnormalities (1, 3, 5 mg/kg/day)  Maternal body weight gain through GD 17: No effect.  Pregnancy outcome: No significant effects on full litter resorptions, # of implants, # or % live fetuses, prenatal litter loss, or fetal weight.  Fetal abnormalities (skeletal and visceral): No effect.  Postnatal mortality  Data presented graphically.  Not affected at 1 and 3 mg/kg/day.  Severely affected at 5 mg/kg/day. Survival at PND 21: < 20% compared to > 80% in controls.  Neonatal mortality was gradual, with a sharp ↑ during PND 2-10.  Pups were weak and failed to thrive, although lack of maternal care was not observed.  Milk was present in stomachs of pups after death, indicating that they were able to suckle and swallow (C. Lau, personal communication).  Offspring body weight  Data presented graphically.  On PND 1-24, dose-related ↓ at all doses, with statistical significance at 3 and 5 mg/kg/day.  At weaning, 3 mg/kg/day and 5 mg/kg/day groups about 27% and 50% lower than the controls, respectively.  Decrements persisted until PND 287 (9 months of age) and were significant in males at this time point.  Markers of post-natal development (day of eye opening, day of vaginal opening, and day of preputial separation)  Data presented graphically.  Dose-dependent delays, with statistically significant for all three endpoints at 3

Reference and Study Design			Res	ults			Comment
Das et al. (2015) (continued).  Developmental toxicity of perfluorononanoic acid in mice	day after the las - Dose-related (PND 28). Sign	o data prese I non-pregna n absolute a s and liver w t dose was I↑ (absolute ificant at 3 a	ented graphica ant females of and relative live reight assesse administered and relative and 6 mg/kg/o	ally; fetal data n GD 17 and ver weights, s ed at the sam . ) persisted 4 v day.	post-weaning (F statistically signif ne time point (GE weeks after dosi	PND 28): ficantly at D 17), one	
		er Weight (	Pregnant fer	males, GD 17	")		
	Dose (mg/kg/day)	0	1	3	5		
	Serum level (ug/ml)		11.5	38.5	156.1		
	Absolute weight (g)	2.24	3.30	4.36	5.26		
	Relative weight (%)	7.12	9.76	12.43	15.27		
	<ul> <li>Fetuses: Dos significantly at a mg/kg/day. Mag</li> <li>Pups: Dose-resignificant at all 42.</li> </ul>	ill doses, ex gnitude of th elated ↑ in re	cept that ↑ in ne increases v elative liver w	absolute liver was similar in reights on PN	r weight not sign all dose groups D 1 through PNI	nificant at 5 s. D 70;	

affected.

#### Results Reference and Study Design Comment Serum levels of Fang et al. (2008). **Body weight** PFNA were not **Immunotoxic** Body weight gain (g) after 14 days PFNA dosing measured in this effects of study. mg/kg/day 0 3 5 perfluorononanoic +0.6 -0.1 -2.5 -3.1 acid on BALB/c In preliminary Decreased at all doses, p<0.01 at 3 and 5 mg/kg/day mice. study, 50% mortality in mice Effects on thymus Species and given 10 Data presented graphically. Complete numerical data not provided. strain: mg/kg/day for 14 • Thymus weight: At 3 and 5 mg/kg/day, 1 relative and absolute (33% and 44%) weight (p<0.01). Male BALB/c mice. • T cell subsets: Dose-related ⊥ in immature (CD4<sup>+</sup>CD8<sup>+</sup>) and ↑ in mature (CD4<sup>+</sup>CD8 : CD4 CD4<sup>+</sup>). days. 6-8 weeks old. p<0.01 at 5 mg/kg/day. The in vitro • Cell cycle: Dose related ↑ in % in G0/G1 (p<0.01 at 5 mg/kg/day) and ⊥ in % in G2/M (p<0.01 at 3 Group size: response of and 5 mg/kg/day). % in S $\perp$ at 5 mg/kg/day (p<0.01). 6 per group. splenic Apoptosis: ↑ at 5 mg/kg/day (p<0.01).</li> lymphocytes from Test article and Effects on spleen PFNA treated vehicle: Data presented graphically. Complete numerical data not provided. mice to the PFNA: vehicle not Spleen weight: ↓ absolute weight (10% and 13%; p<0.01) at 3 and 5 mg/kg/day; ↓ relative weight</li> mitogen Con-A stated. (p<0.01) at 5 mg/kg/day. did not differ from • Innate splenic immune cells: Two types of cells significantly \( \perp \) at all doses; one cell type significantly controls. Route of ⊥ at 3 and 5 mg/kg/day. exposure: • T-cell subsets: Percentages of three types evaluated were nearly unchanged. Oral gavage. Cell cycle: ↑ in % in G0/G1 (sig. at 3 and 5 mg/kg/day) and ↓ in % in G2/M (sig. at all doses). % in S $\downarrow$ at 5 mg/kg/day (p<0.01). Exposure levels: Apoptosis: ↑ at 5 mg/kg/day (p<0.01).</li> 0, 1, 3, 5 Cytokine secretion by T lymphocytes: Dose-related ⊥ in IL-4 at all doses, and IFN-gamma ⊥ at 5 mg/kg/day. mg/kg/day (p<0.01). Serum hormone levels **Exposure** Data presented graphically. Complete numerical data not provided. reaimen: ACTH (5 mg/kg/day) and c ortisol (3 and 5 mg/kg/day) ↑ significantly. At 5 mg/kg/day, ACTH ↑ 53% 14 days. and cortisol ↑ 51%. Related studies: Gene expression Fang et al. (2010) • Data presented graphically. Numerical data not provided. • PPAR-alpha & PPAR-gamma: ↑ (p<0.01) at low dose (1 mg/kg/day) only. • Glucocorticoid receptor: No effect. • NF-κB-signaling pathway (modulator of inflammatory and immune response): IL-1β (target gene for this pathway) sig. ↑ at low dose (1 mg/kg/day) only. Two other genes involved with this pathway not

Reference and Study Design	Results	Comment
Fang et al. (2009).	Body weight	PFNA serum levels were
Alterations of cytokines and MAPK	Data shown graphically and discussed in text.	not measured in this
signaling pathways are related to the	<ul> <li>Dose-related ↓ at 3 mg/kg/day (18%)) and 5 mg/kg/day (39%). At both</li> </ul>	study.
immunotoxic effect of perfluorononanoic	doses, p<0.01.	Study.
acid.	1 00003, p. 0.01.	Other components of
dold.	Thymus weight (absolute and relative to body weight)	this study evaluated
Species and strain:	Data shown graphically and discussed in text.	changes in gene and
Male Sprague-Dawley rats, 320-340 g.	At 1 mg/kg/day, 24% ↑ in absolute weight; relative weight also ↑	protein expression.
ividic oprague-bawiey rats, 520-540 g.	(p<0.01).	PPAR-alpha and PPAR-
Group size:	● At higher doses, dose-related ↓ in absolute weight at 3 mg/kg/day	gamma genes were ↑ by
6 per group.	(20%) and 5 mg/kg/day (87%). At both doses, p<0.01 for ↓ absolute and	PFNA, similar to what
(10 per group were dosed, but 4 per group	relative liver weight.	occurred in mice (Fang
were used for future proteomics analysis	Totalive liver weight.	et al. 2008)
not part of this study).	Thymus histopathology	ct al. 2000)
not part or this study).	Results provided in text and photos. Quantitative data not presented.	The increases in
Test article and vehicle:	<ul> <li>Text states that dose-related effects included ↑ cortex:medulla ratio, ↑</li> </ul>	cytokines caused by
PFNA (97% pure) in 0.5% Tween-20.	apoptotic lymphocytes, and ↑ tangible body macrophages (macrophages	PFNA may result in
1110 (07 % pare) in 0.0% 1000ii 20.	that have ingested apoptotic cells). Implied but not stated that these	multiple effects
Route of exposure:	effects occur at doses below the highest (5 mg/kg/day).	impacting the immune
Oral gavage.	and the state of t	system, including
	Serum levels of cytokines and cortisol	increased cortisol and
Exposure levels:	Data shown graphically and discussed in text.	activation of genes and
0, 1, 3, 5 mg/kg/day.	• /L-1: Dose-related ↑ (p<0.01) at 3 mg/kg/day (3.15-fold) and 5	proteins involved with
c, ., c, cg,g, aa.j.	mg/kg/day (3.67-fold).	apoptosis in thymus.
Exposure regimen:	• /L-4: ↑ 2.1-fold at 5 mg/kg/day (p<0.01).	
14 days.	• /L-2: Dose-related ↓, significant (p<0.01) at 3 mg/kg/day (29%) and 5	
,	mg/kg/day (40%).	
	<ul> <li>Cortisol: ↑ 1.67 fold at 5 mg/kg/day (p&lt;0.05).</li> </ul>	
	Cortisol. Ti.or fold at 5 mg/kg/day (p<0.05).	

Reference and Study Design	Results	Comment
Fang et al. (2010). Perfluoronanoic acid-induced apoptosis in rat spleen involves oxidative stress and the activation of caspase-independent death pathway.  Species and strain: Male Sprague-Dawley rats. 220-230 g. Age not stated.  Group size: 6 per group.  Test article and vehicle: PFNA (acid, 97% pure) in 0.5% Tween-20 in water.  Route of exposure: Oral gavage.  Exposure levels: 0, 1, 3, 5 mg/kg/day.  Exposure regimen: 14 days.  Related studies: Fang et al. (2008).	Spleen weight  Data presented graphically. Complete numerical data not provided.  Absolute weight: ↓ (p<0.01) at all doses.  Relative weight: ↓ (p<0.01) only at 5 mg/kg/day, by 8.5%.  Apoptosis of lymphoid cells in spleen  Results provided in text and photos. Quantitative data not presented.  Evaluated by TUNEL assay for DNA fragmentation.  Apoptotic cell: ↑ at 3 and 5 mg/kg/day. No effect at 1 mg/kg/day.  Levels of cytokines, H₂O₂, and superoxide dismutase in spleen  Data presented graphically. Complete numerical data not provided.  Pro-inflammatory cytokines: Three cytokines ↑ and two ↓ significantly at 5 mg/kg/day. No effects at other doses.  H₂O₂: ↑ (p<0.05) at 5 mg/kg/day only.  Superoxide dismutase: ↓ (p<0.01) at 3 and 5 mg/kg/day.  PPAR gene expression in spleen  Data presented graphically. Complete numerical data not provided.  PPAR alpha: ↑ 2.6-fold at 3 mg/kg/day and 3.5 fold at 5 mg/kg/day (p<0.01). No effect at 1 mg/kg/day.  PPAR gamma: ↑ 2.3-fold at 3 mg/kg/day and 2.1 fold at 5 mg/kg/day (p<0.05). No effect at 1 mg/kg/day.  Protein expression in spleen  See comments.	Serum levels of PFNA were not measured in this study.  The splenic levels of 9 proteins related to apoptotic signaling pathways were measured. The data are presented graphically as ratio of proteins/beta-actin. PFNA caused dose-related changes in levels of some, but not all, of these proteins. Although statistically significant changes compared to controls are indicated, the data for controls are not shown. The role of these proteins and the potential toxicological significance of the changes caused by PFNA are complex and relate to the potential MOA(s) of PFNA-

In vitro and in vivo studies of the toxic effects of perfluorononanoic acid on rat hepatocytes and Kupffer cells.  Species and strain:  Male Sprague-Dawley rats, 6-8 weeks old.  Species and strain:  Male Sprague-Dawley rats, 6-8 weeks old.  Species and strain:  Male Sprague-Dawley rats, 6-8 weeks old.  Species and strain:  Male Sprague-Dawley rats, 6-8 weeks old.  Species and strain:  Male Sprague-Dawley rats, 6-8 weeks old.  Expression of hepatic genes related to lipid metabolism  Data presented graphically. Complete numerical data not provided.  Expression of 6 of 7 genes assessed was affected by PFNA (↓ or ↑) in a doserelated manner, with significance at one or more doses.  Test article and vehicle:  PFNA (97% pure). Vehicle not stated.  Test article and vehicle:  PFNA (97% pure). Vehicle not stated.  Species and strain:  Expression of hepatic genes related to lipid metabolism  Data presented graphically. Complete numerical data not provided.  Expression of 6 of 7 genes assessed was affected by PFNA (↓ or ↑) in a doserelated manner, with significance at one or more doses.  PFNA effects on expression of these genes in hepatocytes in vitro was similar to in vivo for some genes and different for others.  Effects on hepatic cytokines  Trest article and vehicle:  PFNA (97% pure). Vehicle not stated.  Effects on hepatic cytokines  Test article and vehicle:  PFNA (97% pure). Vehicle not stated.  Effects on hepatic cytokines  Test article and vehicle:  Deffects on hepatic cytokines  Test article and veh	Reference and Study Design	Results	Comment
Exposure levels: 0, 0.2, 1, and 5 mg/kg/day.  Exposure regimen:	In vitro and in vivo studies of the toxic effects of perfluorononanoic acid on rat hepatocytes and Kupffer cells.  Species and strain: Male Sprague-Dawley rats, 6-8 weeks old.  Group size: 6 per group  Test article and vehicle: PFNA (97% pure). Vehicle not stated.  Route of exposure: Oral, assumed to be by gavage.  Exposure levels: 0, 0.2, 1, and 5 mg/kg/day.	<ul> <li>Results provided in text and photos. Quantitative data not presented.</li> <li>Terminology different than in other studies presenting liver histopathology data.</li> <li>Focal vacuolar degeneration, indistinct hepatocyte borders, and lipid accumulation at 5 mg/kg/day only; no effect at lower doses.</li> <li>Expression of hepatic genes related to lipid metabolism</li> <li>Data presented graphically. Complete numerical data not provided.</li> <li>Expression of 6 of 7 genes assessed was affected by PFNA (↓ or ↑) in a doserelated manner, with significance at one or more doses.</li> <li>PFNA effects on expression of these genes in hepatocytes <i>in vitro</i> was similar to <i>in vivo</i> for some genes and different for others.</li> <li>Effects on hepatic cytokines</li> <li>Three pro-inflammatory cytokines were significantly ↓ (1.4-2.4 fold) at 0.2 mg/kg/day and ↑ (1.3-1.9 fold) at 5 mg/kg/day; no effect at 1 mg/kg/day.</li> <li>Gene expression for one of these three cytokines ↑ in a dose-related fashion, and two at 5 mg/kg/day.</li> </ul>	Additional in vitro studies showed that PFNA did not decrease hepatocyte or Kupffer cell viability at concentrations up to 50 uM. Cell viability was increased at 5 and 10 uM PFNA. Hepatocyte viability was decreased at 100 uM. Release of liver enzymes (ALT and AST) was not increased by PFNA in hepatocytes cultured with or without

Reference and Study Design	Results	Comment
Fang et al. (2012b).	Data presented graphically. Complete numerical data not provided.	Serum levels of PFNA were
Kupffer cells suppress perfluorononanoic		not measured in this study.
acid-induced hepatic peroxisome	Effect of Kupffer cell inactivation on hepatic PFNA	
proliferator-activated receptor α expression	accumulation and toxicity	Additional <i>in vitro</i> portions of
by releasing cytokines. Arch. Toxicol. 86,	Hepatic PFNA levels after 14 days of dosing were not affected by	this study further investigated
1515-25.	inactivation of Kupffer cells by GdCl <sub>3.</sub>	the mechanisms of the
	<ul> <li>Body weight: ↓ at 5 mg/kg/day. Not affected by inactivation of</li> </ul>	effects observed in the in
Species and strain:	Kupffer cells with GdCl <sub>3.</sub>	vívo studies.
Male Sprague-Dawley rats, age not stated;	• Relative liver weight: dose-related ↑. Not affected by inactivation	
120-130 g.	of Kupffer cells with GdCl <sub>3.</sub>	
	• Liver triglycerides: Dose-related ↑ (p<0.01 at 5 mg/kg/day).	
Group size:	Slightly, but significantly, smaller ↑ when Kupffer cells were	
20 per PFNA dose group. Half of each	inactivated with GdCl <sub>3</sub> .	
dose group treated with gadolinium	• Serum triglycerides and cholesterol: Dose-related \( (p<0.01 at 5	
chloride (GdCl <sub>3</sub> , an inactivator of Kupffer cells).	mg/kg/day). Not affected by inactivation of Kupffer cells with GdCl <sub>3</sub> . • Liver enzymes in serum: 4 enzymes ↑ at 5 mg/gk/day.	
ceis).	Inactivation of Kupffer cells with GdCl <sub>3</sub> significantly reduced the ↑	
Test article and vehicle:	serum levels for 3 of 4 enzymes.	
PFNA (97% pure).		
1 1 147 (01 76 parcy.	Effect of Kupffer cell inactivation on hepatic genes involved	
Route of exposure:	with lipid metabolism	
PFNA – oral gavage.	<ul> <li>Hepatic expression of PPAR-alpha: ↑ slightly but significantly at 5</li> </ul>	
GdCl <sub>3</sub> – intraperitoneal injection.	mg/kg/day. PPAR-alpha target gene expression also ↑ at 1 and 5	
	mg/kg/day (0.2 mg/kg/day not tested).	
Exposure levels:	• PFNA-induced increases in PPAR-alpha were much greater with	
PFNA - 0, 0.2, 1, 5 mg/kg/day.	inactivation of Kupffer cells. Expression of 2 of 3 target genes was	
GdCl <sub>3</sub> – 10 mg/kg	also greater with Kupffer cell inactivation with GdCl <sub>3</sub> .	
	Effect of Kupffer cell inactivation on cytokine release in liver	
Exposure regimen:	homogenate from PFNA-treated rats	
PFNA – daily for 14 days.	<ul> <li>Cytokine release: Dose-dependent ↑ in release of cytokines</li> </ul>	
GdCl <sub>3</sub> – 2 times per week.	TNF-alpha and IL-1 beta in liver homogenates from PFNA-treated	
	rats (significant at 0.02, 1, and 5 mg/kg/day).	
At the end of dosing, liver and blood was	PFNA did not cause ↑ cytokine release when Kupffer cells were	
collected from 6/10 rats/group for analysis.	inactivated with GdCl <sub>3</sub> .	
Hepatocytes and Kupffer cells were		
isolated from the livers of the other rats in		
each group.		
Related studies:		
Fang et al. (2012a).		
ung ot al. (2012a).		

Reference and Study Design	Results	Comment
Fang et al. (2012c).  Exposure of perfluorononanoic acid suppresses the hepatic insulin signal pathway and increases serum glucose in rats.  Species and strain:  Male Sprague-Dawley rats, age not stated. 120-130 g.	Data presented graphically. Complete numerical data not provided.  Serum glucose, HDL, LDL  Serum glucose: Dose-dependent ↑ (significant at 1 and 5 mg/kg/day).  HDL: Dose-dependent ↓ (significant at all doses).  LDL: Significantly ↑ only at 5 mg/kg/day.  HDL/LDL ratio: Dose-dependent ↓ (significant at 1 and 5 mg/kg/day).	Serum levels of PFNA were not measured in this study.
Group size: 6 per group  Test article and vehicle: PFNA (97% pure), in water.  Route of exposure: Oral gavage  Exposure levels: 0, 0.2, 1, and 5 mg/kg/day  Exposure regimen: 14 days	Liver glycogen  • Dose-dependent ↑. Significant (1.88-fold change) at highest dose (5 mg/kg/day).  Hepatic markers of oxidative stress  • H <sub>2</sub> O <sub>2</sub> : significantly ↑ 1.71-fold at highest dose (5 mg/kg/day).  • Malondialdehyde: significantly ↑ 1.50-fold at highest dose (5 mg/kg/day).  Hepatic expression of genes related to glucose metabolism  • Genes for glucose-6-phosphatase and glucose transporter ↑ and gene for gluokinase ↓ at 5 mg/kg/day; Pl3Kca ↓ at all doses.  Hepatic proteins involved with insulin signaling pathway  • Four proteins significantly ↓ (two at all doses; two at 1 and 5 mg/kg/day).  • One protein, p-GSK3-beta, significantly ↑ at all doses.  • Significance of these findings discussed in text.	

Reference and Study Design	Results	Comment
Feng et al. (2009). Perfluorononanoic acid induces apoptosis involving the Fas death receptor signaling pathway in rat testis.	Hormone levels in serum  • Data presented graphically. Complete numerical data not provided.  • Estradiol: No significant effect at 1 and 3 mg/kg/day; ↑ by 104% (p<0.01) at 5 mg/kg/day.  • Testosterone: ↑ by 87.5% at 1 mg/kg/day (p<0.01); no change at 3 mg/kg/day; ↓ by 85.4% at 5 mg/kg/day (p<0.01).  • FSH and LH: No effect.	Serum levels of PFNA were not measured in this study.
Species and strain: Male Sprague-Dawley rats, 7 weeks old	Histological examination of testes     Results provided in text and photos. Quantitative data not presented.     5 mg/kg/day – Disorganization and atrophy of the seminiferous tubules, with germ cells sloughed into the lumen, crescent chromatin condensation and chromatin margination in the	In preliminary study, all rats given 20
<b>Group size:</b> 6 per group	germ cells.	mg/kg/day for 14 days
Test article and vehicle: PFNA (97% pure) in 0.2% Tween-20. Dosing volume – 6 ml/kg.  Route of exposure: Oral gavage  Exposure levels: 0, 1, 3, 5 mg/kg/day	DNA fragmentation in testes (TUNEL assay) (Terminal deoxynucleotidyl transferase dUTP nick end labeling [TUNEL] is a method for visualizing DNA fragmentation by labeling the terminal end of nucleic acids. TUNEL positive cells are considered to be apoptotic.) • Results provided in text and photos. Quantitative data not presented. • Dose-dependent increase in TUNEL positive cells, mainly spermatocytes and spermatogonia with sharp increase in 3 and 5 mg/kg/day groups.  Flow cytometry of testicular cells • Data presented graphically. Numerical results were estimated from graphs. • Percent apoptotic cells: Dose-dependent increase. Not significant at 1 mg/kg/day. Sharp increase at 3 and 5 mg/kg/day (p<0.01).	died.
Exposure regimen:	Estimated % Apoptotic Testicular Cells	
14 days	mg/kg/day 0 1 2 3 1.5% 3% 7% 9%	
Related studies: Feng et al. 2010. Effects of PFNA exposure on expression of junction—associated molecules and secretory function in rat Sertoli cells.	Expression of genes involved in apoptosis pathways in testes  • Mitochondrial-dependent pathway genes: Bax: ↑ 35.7% in 5 mg/kg/day (p<0.05); not significant in other groups. Bcl-2: ↓ in 3 and 5 mg/kg/day (p<0.05).  • Death receptor pathway: Fas: ↑ at all doses. Not significant at 1 and 3 mg/kg/day. At 5 mg/kg/day, ↑ by 90% (p<0.05).  Levels of testicular proteins involved in apoptotic pathways  • Data presented graphically. Complete numerical data not provided.  • Caspase-8 (involved in death receptor pathway): Dose-related ↑ at all doses; 1 mg/kg.day – not significant. 3 and 5 mg/kg/day - p<0.05. 5 mg/kg/day, ~2x control (estimated from graph).  • Caspase-9 (involved in mitochondrial-dependent pathway): Not affected by PFNA.	

Reference and Study Design	Results	Comments
Feng et al. (2010). Effects of	Ultrastructure of rat seminiferous tubule	Serum levels of PFNA were not measured in this
PFNA exposure on expression of	Results provided in text and photos.	study.
junction-associated molecules	Quantitative data not presented.	
and secretory function in rat	Vacuoles between Sertoli cells and	Both in vivo (presented in "Results" column) and in
Sertoli cells.	spermatogonia in 3 and 5 mg/kg/day, but not	vitro (presented below to complement the in vivo
	controls; more numerous and larger in 5	data) studies were reported.
Species and strain:	mg/kg/day.	
Male Sprague-Dawley rats, 7	<ul> <li>Increasing germ cell degeneration in 5</li> </ul>	Summary of in vitro studies:
weeks old	mg/kg/day.	Primary cultures of Sertoli cells were exposed to 0
	<ul> <li>1 mg/kg/day not evaluated for this endpoint.</li> </ul>	1, 10, 25, 50, and 75 μM PFNA (0.464 – 34.8
Group size:		mg/L). These concentrations were not cytotoxic.
6 per group	Testicular Wilms Tumor Protein (WT1) and	
	Transferrin protein	Expression not affected for genes related to: tight
Test article and vehicle:	Data presented graphically. Numerical data not	junctions, adherens junctions, components of the
PFNA (97% pure) in 0.2%	provided.	seminiferous tubule basement membrane, and
Tween-20	<ul> <li>WT1: ↑ at all doses (p&lt;0.05, 5 m/kg/day;</li> </ul>	Sertoli cell products sertolin and testin.
Route of exposure:	p<0.01, 1 and 3 mg/kg/day).	Expression upregulated (at higher
Oral gavage	<ul> <li>Transferrin: Dose related ↓. 1 mg/kg/day -;</li> </ul>	concentrations) for gene related to an intermediate
Olai yavaye	p<0.05; 3 and 5 mg/kg/day - p<0.01.	filament protein.
Exposure levels:	<ul> <li>Consistent with gene expression changes in</li> </ul>	marrient protein.
0, 1, 3, 5 mg/kg/day	vitro (see Comments).	The effect of PFNA on gene expression for
Some endpoints not evaluated		factors related to germ cell development secreted
for 1 mg/kg/day group.	Serum Mullerian Inhibiting Substance (MIS) and	by Sertoli cells was evaluated. Results for the two
,	Inhibin B	factors also assessed in vivo (MIS & WT1) were
Exposure regimen:	Data presented graphically. Numerical data not	qualitatively consistent with the in vitro data as
14 days	provided.	follows: Expression of MIS gene was increased at
•	• M/S: dose-related ↑ (not significant at 1 and 3	≥10 µM, and WT1 gene expression was
Related studies:	mg/kg/day; p<0.05 at 5 mg/kg/day).	dramatically increased at all PFNA concentrations.
Feng et al. 2009.	• Inhibin B: dose-related ↓ (1 mg/kg/day, p<0.05;	Expression of transferrin and inhibin B genes were
Perfluorononanoic acid induces	3 and 5 mg/kg/day, p<0.01).	significantly decreased at higher concentrations.
apoptosis involving the Fas	Consistent with gene expression changes in	Results for several other genes are also presented
death receptor signaling pathway	vitro (see comments).	
in rat testis.		•Levels of two cytoskeleton-associated proteins
		involves in formation of adherens junctions were
		not affected by PFNA in vitro.

Reference and Study Design			Res	ults			Comment			
Kennedy (1987).					A		Serum levels of PFNA were not			
Increase in mouse liver weight							measured in this study.			
following feeding of ammonium		<u>Liver:</u>								
perfluorooctanoate and related			Dietary	exposure lev	el (ppm)		The authors state that PFNA appears to more toxic than			
fluorochemicals.		0	3	10	30	300**				
Outside and studies	Male	5.4, 6.0	8.4	13.7	17.1	19.0	PFOA, based on observations in			
Species and strain:	Female	5.7, 5.7	7.7	13.7	16.7	25.5	this study.			
Male and female Crl:CD-1 mice.	Tomalo	0.1, 0.1	7.7	10.7	10.7	20.0				
40-45 days old.	*All dosed a	roups were sig	anificantly d	ifferent from	controls (p>0	0.05).				
Group size: 5 per group.		ed that all mic								
Group size. 5 per group.		ut data for 300								
Test article and vehicle:	]									
Ammonium perfluorononanoate,	Other obse	rvations								
99% pure.	Weight loss	and generaliz	ed weaknes	ss seen at 30	ppm.					
Route of exposure: Diet										
Exposure levels:										
0, 3, 10, 30, 300, 3000 ppm. (All										
mice died at 300 and 3000 ppm).										
Based on assumed food										
consumption of 1.5 g/10 g body										
weight/ day (University of										
Wisconsin, 2014), the doses are										
estimated as 3 ppm - 0.45										
mg/kg/day, 10 ppm -1.5										
mg/kg/day, and 30 ppm - 4.5										
mg/kg/day.										
Exposure regimen: 14 days										
The PFNA results are part of a										
larger study that also included										
PFOA, Telomer B ammonium										
sulfate, and WG-111.										

Comment Serum levels of PFNA were not measured in this study.

Reference and Study Design	
Kinney et al. (1989).	Mortality
Acute inhalation toxicity of	
ammonium perfluorononanoate.	
Species and strain:	Mortalit
Male Crl:CD BR rats, age not	Post-
stated. 234-298 g.	exposur
	days wh
Group size:	deaths
10 per group for 2 lowest dose	occurred
groups.	*No morta
6 per group for 4 highest dose	**Five sad
groups.	Body we
	One da
Test article and vehicle:	• At 12-1
Ammonium perfluorononanoate	mg/m³ los
(≥99% pure).	Clinical
Route of exposure:	• At >590
Inhalation of dust, nose only.	ruffled/dis
	pallor; lun
Exposure levels:	during the
Mean concentrations: 67, 590,	• At 590
620, 910, 1600, and 4600	
mg/m <sup>3</sup> . (Ranges and standard	Liver: bo
deviations provided.)	
Exposure regimen:	5 days
One 4 hour exposure.	12 days

Two lowest dose groups (n=10)

were sacrificed 5 days (n=5) and 12 days (n=5) after exposure

Other groups were followed for

14 days post-exposure.

ended.

/lortality
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days when 12 9-11 4-8 exposur deaths	Exposure level (mg/m³)*								
Post- exposure days when 12 9-11 4-8 exposure deaths									
exposure days when 12 9-11 4-8 exposure deaths	Mortality 0/10 1/10 0/6 4/6 6/6 6/6								
00001100	exposure days when		12		9-11	4-8	During exposure.		

Results

- post-exposure, ↓ 1-9% at 67 mg/m³ and 6-15% at higher doses.
- days post-exposure, most surviving rats at 590, 620, and 910 29-46% of initial weight.

### ins and autopsy observations

- ng/m<sup>3</sup>, dose-related signs including hunched posture; olored fur; discharge from eyes, nose, mouth; stained perineum; noise/labored breathing; lethargy; limpness; hair loss were seen post-exposure period.
- g/m<sup>3</sup>, gross lesions in liver at sacrifice on days 5 and 12.

### y weight ratio (percent)\*

	0 (Two control groups)	67	590
5 days	4.09, 4.95	5.24	5.80
12 days	4.68, 4.65	6.27	7.00

\*p<0.05 for all treated groups.

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ificed on day 5, and five on day 12.

DRAFT

Reference and Study Design	Results	Comment
Mertens et al. (2010). Subchronic toxicity of S-111-S- WB in Sprague Dawley rats.	<u>Survival</u> : All rats survived until scheduled necropsy. <u>Clinical signs</u> : 2/10 high dose (0.6 mg/kg/day) males exhibited clinical signs, stated to be associated with decreased body weight and food	Surflon S-111 is a commercial mixture of linear perfluorinated carboxylic acids containing primarily PFNA. The specific
Species and strain: Crl:CD (SD) IGS BR rats, approximately 45 days old.	consumption, beginning in week 10.  Body weight and food consumption:  Shown graphically and discussed in text.	composition of the Surflon S-111 used in this study is not reported; this information has been
Group size:  ■ Main 90 day study: 10 per sex per dose.  Additional groups;  ■ 60 day recovery period after 90 day dosing: 5 per sex per dose for control and 0.6 mg/kg/day only.	<ul> <li>Weight loss or ↓ weight gain: Statistically significant in high dose (0.6 mg/kg/day) males beginning in weeks 2 to 3; weight ↓ to 24% below controls at day 90.</li> <li>Body weight in the high dose (0.6 mg/kg/day) males remained 12.5% below controls after 60 day recovery period.</li> <li>No effects in females.</li> <li>Body weight effects not attributable to ↓ food consumption.</li> </ul>	requested but not provided from the study sponsors to date. The composition of Surflon S-111 by weight was reported by Prevedouros et al. (2006) as: PFNA, 74%; perfluoroundecanoic acid (C11), 20%; perfluorotridecanoic acid (C13),
<ul> <li>Peroxisome proliferation in liver after 10 days of dosing: 5 per sex per dose.</li> <li>Toxicokinetics: 5 per sex per dose.</li> <li>Test article and vehicle: Surflon S-111 in water (see</li> </ul>	<ul> <li>Hematology</li> <li>Tabular data for all doses at Week 13, and for control and high dose (0.6 mg/kg/day) for Week 21 (post recovery).</li> <li>Statistically significant effects in 0.6 mg/kg/day males only:</li> <li>Week 13: ↑ prothrombin time; ↓ reticulocytes (p&lt;0.05).</li> <li>Week 21 (post recovery): ↓ hemoglobin, hematocrit (p&lt;0.05); red cells (p&lt;0.01); ↑ lymphocytes (p&lt;0.05).</li> </ul>	5%; PFOA (C8), 0.78%; perfluorodecanoic acid (C10), 0.37%; and perfluorododecanoic acid (C12), 0.1%. This composition was used to estimate the PFNA doses in this study.
comments for composition).  Route of exposure: Oral gavage.	Clinical Chemistry  ■ Tabular data for all doses at Week 13, and for control and high dose (0.6 mg/kg/day) for Week 21 (post recovery).  ■ Alkaline phosphatase and albumin/globulin ratio: ↑ in 0.125 mg/kg/day	Data on serum levels of PFOA, PFNA, C11, and C13 in males and females in each dose group
Exposure levels: Surflon S-111: 0, 0.025, 0.125, or 0.6 mg/kg/day. PFNA (estimated; see comments): 0, 0.019, 0.09, and 0.44 mg/kg/day.	and 0.6 mg/kg/day males and females at 13 weeks, and in recovery group males at 21 weeks  • Total protein and globulin: ↓ in 0.6 mg/kg/day males at 13 weeks.  • BUN, bilirubin, and chloride (chloride data not shown): ↑ at 13 weeks in 0.6 mg/kg/day males.  Liver Weight	over time were presented graphically by Mertens et al. (2010). However, it is not possible to accurately estimate the serum values at lower dose levels from the graphs due to their scale. The numerical serum
Exposure regimen: Daily for 90 days	<ul> <li>Tabular data for all doses at Week 13, and for control and high dose (0.6 mg/kg/day) for Week 21 (post recovery).</li> <li>At 13 weeks, dose-related ↑ (absolute, and relative to body weight and brain weight) significant in 0.135 mg/kg/day males and 0.6 mg/kg/day.</li> </ul>	data have been requested from the study sponsors but have not been provided to date.
Related study: Stump et al. (2008).	brain weight); significant in 0.125 mg/kg/day males and 0.6 mg/kg/day males and females. Liver:body weight increase similar in mid dose (0.125 mg/kg/day) males and high dose (0.6 mg/kg/day) females.  • Recovery group at week 21 (60 days post-dosing): liver weight parameters remained increased in males, but not females, at 0.6 mg/kg/day.	·

Reference and Study Design	Results	Comment
Mertens et al. (2010) (continued). Subchronic toxicity of S-111-S-WB in Sprague Dawley rats.	Hepatic beta-oxidation (marker of peroxisome proliferation)  ■ Tabular data for all doses at 10 days, 90 days (week 13), and for control and high dose (0.6 mg/kg/day) for Week 21 (60 days post dosing).  ■ 10 days: Significant ↑ in 0.6 mg/kg/day males only.  ■ 90 days: Significant ↑ in 0.125 mg/kg/day males, and 0.6 mg/kg/day males and females.  ■ Week 21 (60 days post dosing): Significant ↑ in 0.6 mg/kg/day males only.  Liver histopathology  ■ Tabular data for males at all doses at Week 13, and for control and high dose (0.6 mg/kg /day) for Week 21 (60 days post dosing).  ■ At 0.125 and 0.6 mg/kg/day at Week 13, dose-related incidence of hepatocellular hypertrophy and eosinophilic foci in males.  ■ At 0.6 mg/kg/day at Week 13, some male rats had acute inflammation, degeneration, and necrosis. The incidence of necrosis was 2/10 (minimal grade).  ■ In recovery group (60 days post dosing) 0.6 mg/kg/day males, similar effects were seen as at the end of dosing (week 13), with hypertrophy persisting in all animals.  ■ In females, only the control and high dose (0.6 mg/kg/day) were evaluated (data not shown). No effects observed.  Gastrointestinal histopathology  ■ Tabular data for males at all doses at Week 13, and for control and high dose (0.6 mg/kg /day) for Week 21 (60 days post dosing).  ■ Inflammation, ulceration, erosion, and hyperplasia were observed in the duodenum and stomach of some 0.6 mg/kg/day males at week 13.  ■ Minimal stomach erosion persisted in one recovery group 0.6 mg/kg/day male, 60 days after dosing ended.  ■ In females, only the control and high dose (0.6 mg/kg/day) were evaluated (data not shown). No effects observed.  Other parameters (data not shown)  ■ No treatment-related macroscopic changes. No effects on weights of 9 organs other than liver. No histopathological effects (except liver and gastrointestinal). No effects on functional observational battery and locomotor activity assessments, ophthalmic examinations, or urinalysis.	Notably, no effects were seen on kidney weight or histopathology. The same doses of Surflon S-111 caused effects on these endpoints in rats in the longer duration (18-21 week) two-generation study (Stump et al., 2008).

Reference and Study Design	Results	Comment
Rockwell et al. (2013).	Body weight and organ weights	Serum levels of PFNA were not
Acute immunotoxic effects of	<ul> <li>Body weight: ↓ 31% (M), ↓ 38% (F) (p&lt;0.05).</li> </ul>	measured in this study.
perfluorononanoic acid (PFNA)	<ul> <li>Relative spleen weight: ↓ 60-70% (p&lt;0.05).</li> </ul>	
in C57BL/6 mice.	<ul> <li>Relative kidney weight: Little or no effect.</li> </ul>	Although this study indicates the
	<ul> <li>Relative liver weight: ↑ ~300% (p&lt;0.05).</li> </ul>	potential for PFNA to cause immune
Species and strain:	Viabilities of leukocytes and RBCs in spleen, and thymocyes	toxicity, the dose used was high
Male and female C57BL/6 mice,	• Splenic leukocyte counts: \ 87.5%(M), \ \ 93%(F) (p<0.05).	enough to cause overt toxicity, as
8 weeks old.	<ul> <li>Splenic red blood cell counts: ↓ 95%(M), ↓ 89%(F) (p&lt;0.05).</li> </ul>	demonstrated by the severe weight loss
	• Control viability was >99%. ↓ to 46.7%(M), ↓ to 71.5%(F)	seen in treated animals. Also, the route
Group size:	(p<0.05).	of administration, i.p. injection, is not
5 per group (male)	<b>4</b> 7	relevant to human exposure.
4 per group (female)	Effects on cell populations in spleen and thymus	
Test article and vehicle:	• Spleen T cells: ↑ CD4 <sup>+</sup> (F) and CD8 <sup>+</sup> (M, F) (p<0.05).	
PFNA (97% pure) in propylene	<ul> <li>Spleen B cells: ↓ CD19<sup>+</sup> (marker for B cells) in females (p&lt;0.05).</li> <li>Spleen phagocytes: ↓ CD14<sup>+</sup> (marker for phagocytes) in M and F</li> </ul>	
glycol:water, 1:1.	(p<0.05).	
glycol.water, 1.1.	<ul> <li>Thymus cells: Severe ↓ in immature (CD4<sup>†</sup>CD8<sup>†</sup>) from 76-80% in</li> </ul>	
Route of exposure:	controls to 1% in treated; accompanied by ↑ in mature (CD4 CD8);	
Intraperitoneal injection	CD4 CD4 <sup>+</sup> ) and CD4 CD4 <sup>-</sup> . (p<0.05 for all).	
intrapertioneal injection		
Exposure levels:	Tumor necrosis factor alpha (TNF-alpha)	
46.4 mg/kg (stated as 0.1	TNF-alpha production (mediator of inflammation produced by	
mmol/kg)	macrophages) in response to lipopolysaccharide (LPS) was ↑ ~6-	
0,	fold in PFNA-treated compared to controls. (p<0.05; data shown	
Exposure regimen:	only for males).	
One dose, followed by sacrifice 2		
weeks later.		

Reference and Study Design	Results	Comment
Rogers et al. (2014).	Maternal body weight gain	PFNA serum levels were not measured
Elevated blood pressure in	<ul> <li>Presented graphically and discussed in text.</li> </ul>	in this study.
offspring of rats exposed to	● ↓ (p<0.05) on GD 4-19.	
diverse chemicals during		The number of pregnant dams dosed
pregnancy.	Pup weight at birth	with PFNA is not provided. There were
. •	<ul> <li>Presented graphically and discussed in text.</li> </ul>	21 animals in the control group and 12-
Species and strain:	● ↓ (p<0.05) in males and females.	21 animals in groups dosed with other
Pregnant Sprague-Dawley rats	,	chemicals.
	Postnatal growth	
Group size:	Discussed in text; data not shown.	Only one dose level of PFNA was used
Not stated (data appears to have	<ul> <li>No significant effects at weaning (PND 21) or until 56 weeks of</li> </ul>	in this study.
been inadvertently omitted)	age.	
,		Renal glucocorticoid mRNA at birth and
Test article and vehicle:	Systolic blood pressure in offspring	aldosterone on PND 28 were not
PFNA in water	Presented graphically and discussed in text.	affected by PFNA in this study.
	● ↓ (p<0.05) in males and females on PND 10, but not PND 26 or	,,-
Route of exposure:	56.	
Oral gavage		
- · · · · · · · · · · · · · · · · · · ·	Nephron endowment in renal glomeruli	
Exposure levels:	<ul> <li>Presented graphically and discussed in text.</li> </ul>	
5 mg/kg/day	● ↓ (p<0.05) in males on PND 22. No effect in females.	
,	Not associated with changes in body weight or kidney weight.	
Exposure regimen:	The state of the s	
GD 1-20		

Mertens et al. (2010).

Reference and Study Design	Results	Comment
Reference and Study Design  Stump et al. (2008). An oral two-generation reproductive toxicity study of S-111-S-WB in rats.  Species and strain: Crl:CD (SD) 6 weeks of age (F0 generation)  Group size:  • F0 and F1adults: 30/gender/group. • Eight F0 females/dosed group for toxicokinetic evaluation. • F1 and F2 litters: 22-30 litters per dose group.  Test article and vehicle: Surflon S-111 in deionized water. (see comments for composition).  Route of exposure: Oral gavage, dose volume 2 ml.  Exposure levels: Surflon S-111: 0, 0.025, 0.125, or 0.6 mg/kg/day. PFNA (estimated; see comments): 0, 0.019, 0.09, and 0.44 mg/kg/day	Clinical observations/survival One high dose (0.6 mg/kg/day) F1 male with 171 g body loss was euthanized <i>in extremis</i> after 14 weeks of dosing.  Body weight Shown graphically and discussed in text. Statistically significant weight loss or ↓ weight gain in high dose F0 and F1 high dose (0.6 mg/kg/day) males beginning in weeks 7-8; F0 weight ↓ to 24.8% below controls at week 18. No effects in females. Effects not attributable to ↓ food consumption.  Reproductive parameters F0 and F1 data shown in tables. Fertility index: significantly ↓ (from 90% to 73%) only in low dose (0.025 mg/kg/day) F0 males and females. Other reproductive parameters in F0 or F1: not affected.  Spermatogenic endpoints F0 and F1 data shown in tables. Sperm motility and progressive motility: significantly ↓ in high dose (0.6 mg/kg/day) F1 males. Text states that this effect is not test related because reproductive organ weights were not affected. However, data tables show significantly ↓ left epididymis weight in	Surflon S-111 is a commercial mixture of linear perfluorinated carboxylic acids containing primarily PFNA. The specific composition of the Surflon S-111 used in this study is not reported; this information has been requested but not provided from the study sponsors to date. The composition of Surflon S-111 by weight was reported by Prevedouros et al. (2006) as: PFNA, 74%; perfluoroundecanoic acid (C11), 20%; perfluorotridecanoic acid (C13), 5%; PFOA (C8), 0.78%; perfluorodecanoic acid (C10), 0.37%; and perfluorododecanoic acid (C12), 0.1%. This composition was used to estimate the PFNA doses
Exposure regimen:  ● F0 males and females: Starting at 6 weeks, for at least 70 days prior to mating, throughout mating, gestation, and lactation, and until euthanasia. Total duration not stated, but graphical data indicate dosing period was 18 weeks.  ● F1 males and females: Dosed for at least 70 days prior to mating, throughout mating, gestation, and lactation, until euthanasia. The age at which dosing began and the duration of dosing are not explicitly stated. Data presented indicates that dosing began at 4 or 6 weeks and continued for 21 weeks.	high dose F0 and F1 males, and significantly ↓ left epididymis sperm concentration in high dose F0 males.  Hepatic effects (F0 and F1 adult)  Liver weight  ■ Data shown in tables and discussed in text.  ■ Liver weights (absolute and relative to body weight): significantly ↑ in mid (0.125 mg/kg/day) males and high (0.6 mg/kg/day) dose males and females.	in this study.  Exposure duration (18-21 weeks) in this study was longer than in the 90 day (13 week) subchronic study (Mertens et al., 2010).
Related studies:		

Reference and Study Design			Resi	ults		Comment
Stump et al. (2008) (continued). An oral two-generation reproductive toxicity study of S-111-S-WB in rats.	<ul><li>Data</li><li>Ass</li><li>0.125</li><li>Hep</li><li>treated</li></ul>	essed in al (low and m atocellular d groups w	tables and dis I F0 and F1 graid dose) F1 for hypertrophy (	<i>(males):</i> High f ed increases in	.025 and requency in all	
	Incid	ence (%) o	f hepatocellul mal	ar hypertrophy es	in F0 and F1	
		Ехро	sure level (mg	g/kg/day Surflo	n S-111)	
		0	0.025	0.125	0.6	
	F0	0/30	21/30	30/30	29/30	
		(0%)	(70%)	(100%)	(97%)	
	F1	0/30 (0%)	23/30 (77%)	29/29 (100%)	30/30 (100%)	
	Inc		mal	ular necrosis ir es q/kg/day Surflo		
		0	0.025	0.125	0.6	
	F0	0/30 (0%)	2/30 (7%)	5/30 (17%)	5/30 (17%)	
	F1	0/30 (0%)	3/30 (10%)	4/29 (14%)	8/30 (27%)	
	cell for and/or inflam  • Fen	ci, and vac incidence mation in o nales: Hep	uolation in all increasing wi nly one contro atocellular hy		with severity al	

Reference and Study Design			Resi	ults		Comment
Stump et al. (2008) (continued). An oral two-generation reproductive toxicity study of S-111-S-WB in rats.	Kidne  Midne  Kidne  Kidne  Kidne  Kidne  Ass  1.125  Rer	effects (For weight as hown in hey weights cantly ↑ in to day) Fo fewer histopation as hown in essed in all (low and moral tubule can Fo and For weights and For and For weights and for weight and for weights and for weigh				
	Incid	lence (%) o  Expo				
	F0	0/30	0.025	0.125 5/30 (17%)	0.6 28/30 (93%)	
	F1 0/30 (0%) 0/30 (0%) 0/29 (0%) 30/30 (100%)  Other changes (F0 males): Renal inflammation (1/30 mid dose and 1/30 low dose), brown pigment (2/30 high dose), and capsular fibrosis (1/30 high dose).  Females: Renal tubule cell hypertrophy in 8 of 30 high dose (0.6 mg/kg/day) F0.  Litter data (F1 and F2 pups)  Data shown in tables and discussed in text.  Parameters not affected: Number of pups born, live litter size, postnatal survival, and pup weight through weaning in F1 or F2; nor age at vaginal opening and preputial separation in F1 (not assessed in F2).  Relative liver weights (PND 21): Significantly ↑ in mid (0.125 mg/kg/day) and high (0.6 mg/kg/day) dose F1 males and females, and high dose F2 males and females.					

Reference and Study Design	Results					Comment	
Wang et al. (2014b). Integrated proteomic and miRNA transcriptional analysis reveals the hepatotoxicity mechanism of PFNA exposure in mice.  Species and strain: Male BALB/c mice; 6-8 weeks old.  Group size: 8 per group.	PFNA levels in serum and liver  Numerical data provided. Assessed at the end of dosing period. PFNA levels in serum and liver ↑ with dose. Levels in liver were 2.1-fold (0.2 m/kg/day) to 1.1-fold (5 mg/kg/day) higher than in serum.  Body weight Presented graphically; numerical data not provided.    (p<0.01) at highest dose, 5 mg/kg/day.  Liver weight Presented graphically and discussed in text. Some numerical data estimated from graph. Relative liver weight ↑ (p<0.01) at all doses.					Serum PFNA levels were measured at the end of the dosing period, the same time point at which the toxicological endpoints were assessed.  Other components of this study evaluated the effects of PFNA on expression of genes and proteins related to PPAR-alpha (which increases fatty acid oxidation/lipolysis, and decreases hepatic and serum lipids) and sterol regulatory element-binding proteins (SREBPs) which are related to lipid biosynthesis. Although PPAR-alpha was activated, SREBP genes involved with lipid synthesis were even more strongly activated, at doses below the highest dose.	
Test article and vehicle:	Dalati					7	The authors conclude that PFNA upregulates PPAR-
PFNA (97% pure)	Dose	ive Live				_	alpha-mediated lipid breakdown, but also upregulates SREBP mediated lipid biosynthesis, and that the
Route of exposure:	(mg/kg/day)	0	0.2	1	5		effects on serum and hepatic lipids represent a
Oral gavage	Serum level (ug/ml)		11.5	38.5	156.1	-	balance between these effects. The increased hepatic lipids at the lower doses may occur because
Exposure levels:			1.2	1.6	2.6		the lipid synthesis effect predominates over the
0, 0.2, 1, 5 mg/kg/day	*Relative liver we	eight fo	or 1 an	d 5 mg	/kg/day	estimated from	PPAR-alpha mediated lipid breakdown effect at the lower doses, while the PPAR-alpha stimulation of
Exposure regimen:	graph.						lipolysis is more dominant at the highest dose.
14 days	Serum and liver triglycerides (TG) and total cholesterol (TCH)  • Presented graphically and discussed in text. • Serum TG and TCHO: ↓ (p<0.01) at 5 mg/kg/day. • Liver TG and TCHO: ↑ (p<0.01) at 0.2 and 1 mg/kg/day, but not at 5 mg/kg/day.  Serum levels of liver enzymes (ALT and AST) • Presented graphically. Some numerical data estimated from graph. • ALT and AST: ↑ (p<0.01) 4-8 fold at 5 mg/kg/day.						

Reference and Study Design	Results	Comment
Wolf et al. (2010).  Developmental effects of perfluorononanoic acid in the mouse are dependent on peroxisome proliferator-activated receptor-alpha.  Species and strain: Female wild-type (WT) 129S1/SvImJ mice and PPARα knockout (KO) mice on a 129S1/SvImJ	Pregnancy outcome and maternal weight gain  Maternal weight gain, number of uterine implants, and number of live plus dead pups per litter were not affected by PFNA.  Pregnancy rate: Significantly (p<0.001) ↓ at all doses of PFNA in KO mice compared to control KO mice; no effect in WT mice.  Mitter loss: Non-significant ↑ in high dose (2 mg/kg/day) WT to 35.3% as compared to 14.3% in control WT. No effect in KO.  # of live pups at birth: ↓ at all doses in WT mice; significant at 1.1 and 2.0 mg/kg/day. No effect in KO.  Pup survival from birth to weaning  Dose-related ↓ in WT groups; significant at two highest doses.	Comment Serum PFNA (presented numerically) was measured in all adult females and in 2 pups per litter 23 days after the last dose.  Histopathological examination was not performed on liver or other organs.
background; mated to males of same strain.  Group size: 9-18 pregnant females per group.  Test article and vehicle: PFNA (97% pure) in water.  Route of exposure: Oral gavage, total volume 10 ml/kg.	<ul> <li>Most pup deaths in first few postnatal days.</li> <li>At PND 21, survival was 36% at 1.5 mg/kg/day and 31% at 2 mg/kg/day compared to about 75% in controls.</li> <li>No effect in KO mice.</li> <li>Pup weight gain and eye opening</li> <li>Pup weight at birth: Not affected.</li> <li>Weight gain from birth until weaning:</li> <li>WT: ↓ in male and female WT pups at 2 mg/kg/day; no effect at lower doses.</li> <li>KO: No effects at any dose.</li> <li>Eye opening:</li> <li>WT: significantly delayed in 2 mg/kg/day, no effect at lower doses.</li> <li>KO: No effects at any dose</li> <li>KO: No effects at any dose</li> </ul>	
Exposure levels: 0, 0.83, 1.1, 1.5, or 2 mg/kg/day.  Exposure regimen: GD 1-18.  Adults and pups sacrificed on PND 21.	Adult and pup relative liver weight 23 days after last dose (PND 21).  • Non-pregnant WT and KO adult females: ↑ at all doses; significant in all groups except low dose (0.83 mg/kg/day) KO.  • WT mice that had given birth: ↑ significantly increased at all doses in WT; no significant ↑ in KO.  • KO mice that had given birth: ↑ significantly increased at all doses in WT; no significant ↑ in KO.  • Serum levels in the KO much lower than in the WT for reason(s) that were not determined.  • Pups at weaning (PND 21:  - WT: ↑ at all doses.  - KO: ↑ only at the highest dose (2 g/kg/day).	

# APPENDIX 4. Benchmark Dose calculation from data for maternal and pup endpoints from Das et al. (2015)

(USEPA BMDS software version 2.4.0)

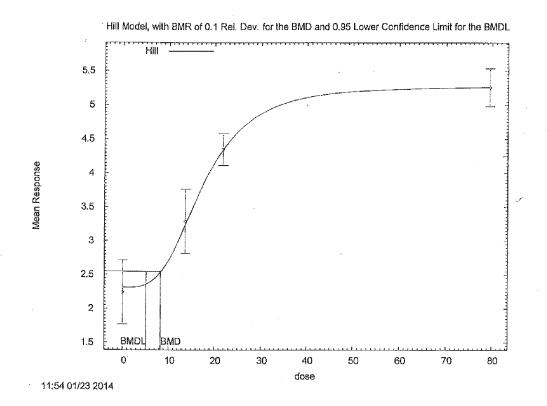
Endpoint	Model <sup>a</sup>	BMR	Akaike information criterion (AIC) statistic	BMD (maternal serum PFNA (na/ml))	BMDL (maternal serum PFNA
Maternal liver weight at	Hill	+10%	-14.67	8,300	5,200 <sup>b</sup>
GD 17	Exponential (BMDS model 5)	+10%	-10.58	6,300	3,200
Pup relative liver weight at	Hill	+10%	-35.45	11,000	8,100
PND 1	Exponential (BMDS model 5)	+10%	-35.45	8,800	5,900
	Polynomial (2-deg.)	+10%	-35.44	3,400	3,000 b
	(Average of Hill and Exponential models)				(7,000) <sup>c</sup>
Pup relative liver weight at	Hill	+10%	7.17	8,600	5,500
PND 24	Exponential (BMDS model 5)	+10%	7.17	7,900	4,900
	(Average of Hill and Exponential models)				(5,200) <sup>C</sup>
Pup body weight at	Hill	-10%	-171.54	19,400	11,100
PND 1	Exponential (BMDS model 4)	-10%	-171.54	19,900	11,500
	Polynomial (2-deg.)	-10%	-173.43	19,500	13,100
	(Average of Hill and Exponential models)				(11,300) <sup>C</sup>
Pup Body weight at PND 24	Hill	-10%	130.90	14,600	6,800
. , .	Exponential (BMDS model 2,3 –(identical))	-10%	129.48	12,400	10,100 <sup>C</sup>
	Exponential (BMDS model 4)	-10%	130.71	9,200	5,800
	Exponential (BMDS model 5)	-10%	130.90	14,700	6,900
	Polynomial (2-deg.)	-10%	130.55	9,300	6,300
	Power (function not restricted to ≥1)	-10%	131.34	17,300	8,000
Vaginal Opening (day)	Hill	+1 SD	83.89	15,670	10,700
_ ,	Exponential (BMDS model 5)	+1 SD	83.89	15,800	10,600
	(Average of Hill and Exponential models)				(10,700) <sup>C</sup>
Preputial Separation	Hill	+1 SD	47.33	13,400	10,100
(day)	Exponential (BMDS model 5)	+1 SD	47.33	13,700	9,900
· ,,	(Average of Hill and Exponential models)				(10,000) <sup>C</sup>
Eye opening	Exponential (BMDS model 4)	+1 SD	28.23	4,100	2,600
(day)	Exponential (BMDS model 5)	+1 SD	27.66	8,100	3,700
	Polynomial (2 deg.)	+1 SD	27.95	4,200	2,800

<sup>&</sup>lt;sup>a</sup> Results are shown for all models providing an acceptable fit to the dose-response data for each endpoint. As discussed in text, modeling was based on maternal serum level on GD 17.

<sup>&</sup>lt;sup>b</sup> Although this model gives a good fit to the data, the nature of the fit does not appear to reflect a realistic dose-response relationship.

<sup>&</sup>lt;sup>c</sup> The BMDL value shown in **bold** for each endpoint represents the most appropriate value based on consideration of the lowest AIC value and the biological reasonableness of the modeled doseresponse.

APPENDIX 5. Benchmark Dose Modeling for 10% Increase in Maternal Liver Weight on GD 17 (Das et al., 2015) Using Hill Model



BMDS Model Run

The form of the response function is:

Y[dose] = intercept + v\*dose^n/(k^n + dose^n)

Dependent variable = Mean Independent variable = Dose

Power parameter restricted to be greater than 1

The variance is to be modeled as  $Var(i) = \exp(lalpha + rho * ln(mean(i)))$ 

Total number of dose groups = 4

Total number of records with missing values = 0

Maximum number of iterations = 500

Relative Function Convergence has been set to: le-008

Parameter Convergence has been set to: 1e-008

Default Initial Parameter Values

lalpha = -1.56135 rho = 0 intercept = 2.24 v = 3.02 n = 0.480048 k = 26.3849

Asymptotic Correlation Matrix of Parameter Estimates

	lalpha	rho	intercept	v	n	k
lalpha	1	-0.98	0.51	-0.47	0.24	0.39
rho	-0.98	1	-0.48	0.45	-0.24	-0.38
intercept	0.51	-0.48	1.	-0.91	0.42	0.73
v	-0.47	0.45	-0.91	1	-0.52	-0.53
n	0.24	-0.24	0.42	-0.52	1	0.39
k	0.39	-0.38	0.73	-0.53	0.39	1

Parameter Estimates

			95.0% Wald Conf	idence Interval
Variable	Estimate	Std. Err.	Lower Conf. Limit	Upper Conf. Limit
lalpha	1.29103	1.48981	-1,62894	4.21101
rho	-2.57146	1,14892	-4.8233	-0.31962
intercept	2.31461	0.228674	1.86642	2.7628
Ā	2.96501	0.259382	2.45663	3.47339
n	3.37428	0.705255	1.992	4.75655
k	17.2519	1.21866	14.8633	19.6404

Table of Data and Estimated Values of Interest

Dose	N	Obs Mean	Est Mean	Obs Std Dev	Est Std Dev	Scaled Res.
						**************************************
0	8	2.24	2.31	0.566	0.648	-0.326
13.7	8	3.29	3.25	0.566	0.419	0.284
21.8	8	4.35	4.35	0.283	0.288	-0.0368
79.5	5	5.26	5.26	0.224	0.225	-0.0259

Warning: Likelihood for fitted model larger than the Likelihood for model A3.

Model Descriptions for likelihoods calculated

Yij = Mu(i) + e(ij)Model Al:  $Var{e(ij)} = Sigma^2$ 

Model A2: Yij = Mu(i) + e(ij) $Var{e(ij)} = Sigma(i)^2$ 

Model A3:

 $\label{eq:continuous} \begin{array}{ll} {\rm Yij} \; = \; {\rm Mu}\,({\rm i}) \; + \; {\rm e}\,({\rm i}\,\dot{\rm j}\,) \\ {\rm Var}\{{\rm e}\,({\rm i}\,\dot{\rm j})\} \; = \; {\rm exp}\,({\rm lalpha} \; + \; {\rm rho} \star {\rm ln}\,({\rm Mu}\,({\rm i})\,)\,) \end{array}$ Model A3 uses any fixed variance parameters that were specified by the user

Yi = Mu + e(i) $Var(e(i)) = Sigma^2$ 

### Likelihoods of Interest

Model	Log(likelihood)	# Param's	AIC
<b>A</b> 1	10.291675	5	-10.583349
A2	14.345828	8	-12.691656
<b>A</b> 3	13.335664	6	-14.671329
fitted	13.335664	6	-14.671329
R	~18,817938	2	41.635876

### Explanation of Tests

Test 1: Do responses and/or variances differ among Dose levels?

(A2 vs. R)

Test 2: Are Variances Homogeneous? (A1 vs A2)

Test 3: Are variances adequately modeled? (A2 vs. A3) Test 4: Does the Model for the Mean Fit? (A3 vs. fitted)

(Note: When rho=0 the results of Test 3 and Test 2 will be the same.)

### Tests of Interest

Test	-2*log(Likelihood Ratio)	Test df	p-value
Test 1	66.3275	6	<.0001
Test 2	8.10831	3	0.04383
Test 3	2.02033	2	0.3642
Test 4	-7.50333e-012	0	NA

The p-value for Test 1 is less than .05. There appears to be a difference between response and/or variances among the dose levels It seems appropriate to model the data

The p-value for Test 2 is less than .1. A non-homogeneous variance model appears to be appropriate

The p-value for Test 3 is greater than .1. The modeled variance appears to be appropriate here

NA - Degrees of freedom for Test 4 are less than or equal to 0. The Chi-Square test for fit is not valid

Benchmark Dose Computation

Specified effect = 0.1

Risk Type = Relative deviation

Confidence level = 0.95

BMD = 8.29974

BMDL = 5,19406